

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

|                         |   |                               |
|-------------------------|---|-------------------------------|
| JENNIFER ELLER,         | ) |                               |
|                         | ) |                               |
| Plaintiff,              | ) |                               |
|                         | ) |                               |
| v.                      | ) | Case No.: 18-cv-03649-TDC/CBD |
|                         | ) |                               |
| PRINCE GEORGE'S COUNTY  | ) |                               |
| PUBLIC SCHOOLS, ET AL., | ) |                               |
|                         | ) |                               |
| Defendants.             | ) |                               |
|                         |   |                               |

**Joint Record**

Pursuant to the Court's Case Management Order, the parties hereby submit the Joint Record concerning Plaintiff's and Defendants' Motions for Summary Judgment (ECF Nos. 97 and 98). The Joint Record consists of Exhibits 1-60 which are Bates numbered J.R. 1–J.R. 916.

| Exhibit Reference | Exhibit Names  | Bates Range   |
|-------------------|--|---------------|
| 1*                | Jennifer Eller Deposition Transcript   | J.R. 1-92     |
| 2*                | Prince George's County Public Schools Discrimination or Harassment Incident Report dated February 13, 2015 | J.R. 93-95    |
| 3*                | EEOC Charge of Discrimination dated June 3, 2015   | J.R. 96-98    |
| 4                 | EEOC Notice of Charge of Discrimination dated  | J.R. 99-100   |
| 5*                | Letter re: Discrimination or Harassment Incident Report dated June 25, 2015                                | J.R. 101-105  |
| 6*                | EEOC Charge of Discrimination dated April 29, 2016   | J.R. 106-107  |
| 7                 | EEOC Notice of Charge of Discrimination dated May 3, 2016  | J.R. 108-109  |
| 8*                | FMLA & LOA Approval Notice dated October 25, 2016  | J.R. 110- 112 |
| 9                 | Plaintiff Jennifer Eller's Responses and Objections to Defendants' First Set of Interrogatories            | J.R. 113-130  |

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| 10* | Raynah Adams Deposition Transcript                               | J.R. 131-211 |
| 11* | Robin Pope Brown Deposition Transcript                           | J.R. 212-254 |
| 12* | Kevin Thompson Deposition Transcript                             | J.R. 255-303 |
| 13* | Courtney King Deposition Transcript                              | J.R. 304-337 |
| 14* | Jocelyn Isom Deposition Transcript                               | J.R. 338-390 |
| 15  | Declaration of Jennifer Eller                                    | J.R. 391-427 |
| 16* | Email from J. Eller dated May 17, 2011                           | J.R. 428-430 |
| 17* | Email from J. Eller dated August 13, 2012<br>(ELLER000124-127)   | J.R. 431-435 |
| 18* | Email from J. Eller dated November 18, 2013<br>(ELLER000477)     | J.R. 436-437 |
| 19* | Email from J. Eller dated August 21, 2012<br>(ELLER001067)       | J.R. 438-439 |
| 20  | Email from K. Thompson dated March 20, 2015                      | J.R. 440-441 |
| 21* | Email from J. Eller dated June 22, 2015                          | J.R. 442-443 |
| 22* | Email from J. Eller dated September 2, 2013<br>(ELLER001011)     | J.R. 444-445 |
| 23* | Email from J. Eller dated October 7, 2015<br>(ELLER000271)       | J.R. 446-447 |
| 24  | Tumblr Post dated January 9, 2012<br>(ELLER001961)               | J.R. 448-449 |
| 25* | Email from J. Eller dated August 30, 2011<br>(ELLER000101-102)   | J.R. 450-452 |
| 26* | Email from J. Eller dated May 13, 2016                           | J.R. 453-454 |
| 27* | Email from J. Eller dated September 8, 2016                      | J.R. 455-457 |
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| 29* | Email from J. Eller dated February 19, 2015<br>(ELLER000299)     | J.R. 460-461 |
| 30* | Email from J. Eller dated October 14, 2013<br>(ELLER000145)      | J.R. 462-463 |
| 31* | Email from J. Eller dated May 4, 2011                            | J.R. 464-465 |
| 32* | Email from J. Eller dated October 28, 2015                       | J.R. 466-468 |
| 33* | Email from J. Eller dated February 19, 2015<br>(ELLER000093)     | J.R. 469-470 |
| 34* | Email from J. Eller dated February 19, 2015<br>(ELLER000093)     | J.R. 471-472 |
| 35* | Marcellus R. Cephas, MD, Deposition Transcript                   | J.R. 473-538 |
| 36* | Expert Declaration of Dr. Randi C. Ettner                        | J.R. 539-612 |
| 37  | Email from R. Adams dated January 7, 2015                        | J.R. 613-614 |
| 38  | Amana Simmons 30(b)(6) Deposition Transcript                     | J.R. 615-688 |
| 39  | Declaration of Irene A. Burks                                    | J.R. 689-693 |
| 40  | Declaration of Megan Weems                                       | J.R. 694-697 |
| 41* | Declaration of Erin Reynolds                                     | J.R. 698-704 |
| 42* | Email from J. Eller dated November 21, 2013<br>(ELLER000115-116) | J.R. 705-707 |

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| 43* | Email from E. Davis dated December 18, 2013  | J.R. 708-711 |
| 44  | Email from R. Adams dated August 21, 2012  | J.R. 712-713 |
| 45* | Email from J. Eller dated August 29, 2012  | J.R. 714-715 |
| 46* | Defendant Prince George's County Public Schools' Responses to Plaintiff's First Set of Requests for Admission          | J.R. 716-724 |
| 47  | Prince George's County Public Schools Bd. of Educ. Policy No. 4185   | J.R. 725-729 |
| 48* | J. Eller MedStar Health Medical Records (ELLER001284-313)  | J.R. 730-760 |
| 49* | J. Eller Georgetown University Hospital Medical Records (ELLER1508-1516)   | J.R. 761-771 |
| 50* | Email from J. Eller dated May 24, 2011   | J.R. 772-774 |
| 51* | Defendant Prince George's County Public Schools' Responses to Plaintiff's Second Set of Requests for Admission         | J.R. 775-784 |
| 52  | Defendant Board of Education for Prince George's County's Responses to Plaintiff's First Set of Requests for Admission | J.R. 785-790 |
| 53* | EEOC Letter of Determination dated September 21, 2017  | J.R. 791-793 |
| 54  | U.S Department of Justice Notice of Right to Sue dated August 20, 2018   | J.R. 794-795 |
| 55  | Email from Teachscape Reflect Team dated December 5, 2014  | J.R. 796-797 |
| 56  | Prince George's County Public Schools Bd. of Educ. Policy No. 0125   | J.R. 798-799 |
| 57* | Email from J. Eller dated August 13, 2012  | J.R. 800-801 |
| 58* | Mark Fossett Deposition Transcript   | J.R. 802-848 |
| 59  | Email from M. Fossett dated September 23, 2015   | J.R. 849-850 |
| 60* | Dr. Randi Ettner Deposition Transcript   | J.R. 851-916 |

\*Exhibits marked with an asterisk are publicly filed with redactions. The full contents are filed under seal.

Respectfully submitted,

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1 IN THE UNITED STATES DISTRICT COURT  
 2 FOR THE DISTRICT OF MARYLAND  
 3 Southern Division  
 4 ----- x :  
 5 JENNIFER ELLER, :  
 6 Plaintiff, : Civil Action No.  
 7 vs. : 18-cv-03649-TDC/TJS  
 8 :  
 9 PRINCE GEORGE'S COUNTY PUBLIC :  
 10 SCHOOLS, et al., :  
 11 Defendants. :  
 12 ----- x :  
 13  
 14 Wednesday, January 22, 2020  
 15 Washington, D.C.  
 16  
 17 The deposition of KEVIN THOMPSON, called for  
 18 examination by counsel for the Plaintiff at the offices  
 19 of Arnold & Porter, 601 Massachusetts Avenue, N.W.,  
 20 Washington, DC, on Wednesday, January 22, 2020, scheduled  
 21 to commence at 10:00 a.m. the proceedings being  
 22 stenographically recorded by Marjorie Peters, Fellow of  
 the Academy of Reporters, (FARR), Registered Merit  
 Reporter (RMR), and transcribed under her direction.

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09:58:36 1 Northeast, Washington, D.C., 20003.

2 Q. Have you ever been deposed before?

3 A. I have not.

4 Q. Have you ever testified at a trial before?

5 A. No.

6 Q. So since you haven't been deposed before,

7 let's start with some ground rules for the deposition.

8 that way it will make things easier for everyone before

9 we get too far into it. You are under oath just as if

10 you were testifying at a trial.

11 Do you understand that?

12 A. Yes.

13 Q. Please answer each question fully and to the

14 best of your recollection; is that okay?

15 A. Yes.

16 Q. Please answer all questions verbally and not

17 with physical movements like a nod or a shrug. That way

18 the Court Reporter can record your answer.

19 Is that okay?

20 A. Yes.

21 Q. Please wait until I have finished my

22 question before responding; is that okay.

PROCEEDINGS

KEVIN THOMPSON,

a witness, having been first duly sworn, was examined and

testified as follows:

EXAMINATION

BY MR. RODRIGUEZ:

Q. Good morning, Mr. Thompson.

A. Good morning.

Q. My name is Michael Rodriguez, and with my

colleague, Elliot Mogul, we represent Miss Eller in this

case. It's a lawsuit against the defendants which are

Prince George's County Public Schools, Prince George's

County Board of Education and Superintendent Gholson.

In this case Miss Eller claims that the

defendants have discriminated against her because of her

sex and transgender status.

Could you please state your name and

address for the record?

A. My name is Kevin Thomas. My address --

school address or home address?

Q. Home address.

A. My home address is 91 14th Street,

09:51:41 1 A. That is fine.

2 Q. If you need a question repeated, please let

3 me know and I'll read it back to you; okay?

4 A. Yes.

5 Q. Please let me know if you do not understand

6 a question or if you need me to rephrase it; Okay.

7 A. Yes.

8 Q. Let me know if you need a break. We can

9 always take a break, except if there's a question

10 pending. If there's a question pending, you'd have to

11 answer the question first and then we can take a break.

12 Is that okay?

13 A. Yes.

14 Q. This one is important. Mr. Sharma may

15 object to some of my questions, and if Mr. Sharma poses

16 some questions, Mr. Mogul or I may object to some of his

17 questions. Those objections are for the court when

18 reviewing the transcript. In spite of any objection, you

19 must answer the question posed. The only exception is if

20 you are instructed not to answer.

21 Do you understand that you are under an

22 obligation to answer every question unless you are

09:52:30 1 Instructed not to answer?  
 2 A. Yes.  
 3 Q. Great. Do you have any other questions  
 4 about how the deposition will work?  
 5 A. I do not.  
 6 Q. Great. So is there anything that would  
 7 prevent you from answering my questions fully and  
 8 accurately today?  
 9 A. No.  
 10 Q. You're not on any medications?  
 11 A. No.  
 12 Q. Haven't taken alcohol this morning?  
 13 A. No.  
 14 Q. No physical limitations?  
 15 A. No.  
 16 Q. Great. Do you understand that you are not a  
 17 defendant in this case?  
 18 A. Yes.  
 19 Q. Have you retained counsel in this matter?  
 20 A. No.  
 21 Q. Have you met with Mr. Sharma before?  
 22 A. No.

09:52:45 1 A. No one.  
 2 Q. And it was just to speak about today's date?  
 3 A. Correct.  
 4 Q. Did he tell you anything else about the  
 5 deposition?  
 6 A. Just what it was pertaining to Miss Eller.  
 7 Q. Great. Did he ask you to do anything to  
 8 prepare?  
 9 A. Absolutely not.  
 10 Q. Did he provide you with any documents to  
 11 review before the deposition?  
 12 A. No.  
 13 Q. Did you review any documents to prepare for  
 14 today's deposition?  
 15 A. I did not.  
 16 Q. Have you spoken with anyone other than  
 17 Mr. Sharma about this deposition or other depositions in  
 18 this case?  
 19 A. I have not.  
 20 Q. So you have not spoken with any in-house  
 21 lawyers from Prince George's County Public Schools?  
 22 MR. SHARMA: Objection. You can answer.

09:53:03 1 Q. Do you understand that Mr. Sharma is  
 2 defendants' attorney?  
 3 A. Yes.  
 4 Q. Do you understand that he's not your  
 5 attorney?  
 6 A. Yes.  
 7 Q. Great. So do you understand that whatever  
 8 you two have discussed is not subject to attorney-client  
 9 privilege?  
 10 A. Yes.  
 11 Q. Great. Have you spoken with anyone about  
 12 this lawsuit?  
 13 A. I have not.  
 14 Q. Did you speak with Mr. Sharma before today's  
 15 deposition?  
 16 A. Yes.  
 17 Q. When was that?  
 18 A. Two weeks ago, two or three weeks ago.  
 19 Prior to today's date.  
 20 Q. Was that on the phone or in person?  
 21 A. It was on the phone.  
 22 Q. And who else was on the phone?

09:54:35 1 A. I have not. For clarification, I reached  
 2 out when Mr. Sharma essentially or initially e-mailed me  
 3 to confirm if he was accurately the lawyer who I needed  
 4 to respond to. That's the only time I have spoken to  
 5 somebody about this.  
 6 Q. Okay. So that was speaking with Mr. Sharma,  
 7 you meant?  
 8 A. No, I spoke with Prince George's County  
 9 Public Schools legal department to make sure I was able  
 10 to respond to him and this request.  
 11 Q. Got it. Did you bring any documents were  
 12 you today?  
 13 A. I did not.  
 14 Q. Did you do any preparation -- sorry,  
 15 preparation for this deposition?  
 16 A. I did not.  
 17 Q. So I'm going to ask you a few questions  
 18 about your background.  
 19 A. Okay.  
 20 Q. So we'll start with education.  
 21 Where did you go to high school?  
 22 A. I went to high school at Friendly High

09:55:23 1 School.  
 2 Q. Look at that.  
 3 A. Ironic.  
 4 Q. When did you graduate?  
 5 A. I graduated 2000.  
 6 Q. Where did you go to college?  
 7 A. I went to undergrad at Florida A & M  
 8 University.  
 9 Q. When did you graduate?  
 10 A. I graduated in 2004.  
 11 Q. What degree about you obtain?  
 12 A. I obtained my degree in English.  
 13 Q. Did you go to graduate school after college?  
 14 A. I did.  
 15 Q. Where did you go?  
 16 A. Went to Bowie State University.  
 17 Q. When did you graduate?  
 18 A. I graduated from there in 2007. Makes me  
 19 feel old.  
 20 Q. What degree did you obtain?  
 21 A. My Master's in Special Education.  
 22 Q. Did you attend any further education after

09:57:06 1 Did you work anywhere between Bowie and  
 2 Catholic?  
 3 A. Between Bowie and Catholic?  
 4 Q. Yeah?  
 5 A. Between Bowie and Catholic, I was Oxon Hill  
 6 Middle School in Prince George's County as a teacher.  
 7 Then after that, it was Charles Carroll  
 8 Middle School.  
 9 Q. At Oxon Hill, what did you teach?  
 10 A. I was an English teacher.  
 11 Q. Did you have any administrative positions at  
 12 Oxon Hill?  
 13 A. I did not.  
 14 Q. Did you teach anything else at Oxon Hill?  
 15 A. No.  
 16 Q. Great. And what was the next school?  
 17 A. Charles Carroll Middle School.  
 18 Q. Were you a teacher there as well?  
 19 A. I was not. I was a Title I coordinator.  
 20 Q. What is a Title I coordinator?  
 21 A. Title I coordinator is the one who kind of  
 22 facilitates the grant that is awarded to the school via

09:58:06 1 you obtained your master's?  
 2 A. I did. I went to Catholic University. I  
 3 got my -- my certificate in administration.  
 4 Q. Was that a educational program or a training  
 5 program?  
 6 A. Educational program.  
 7 Q. Okay.  
 8 A. So I guess, go back, educational  
 9 administration is the certificate.  
 10 Q. Got it. After Catholic University, after  
 11 you obtained your certification in administration, did  
 12 you receive any other certificates or attend any type of  
 13 training or continuing education program?  
 14 A. No.  
 15 Q. So after Catholic University, where was the  
 16 first place you worked at?  
 17 A. After Catholic University, the first place I  
 18 worked was Charles Carroll Middle School.  
 19 Q. Is that a Prince George's County Public  
 20 School?  
 21 A. Yes, yes.  
 22 Q. Okay. Let's take a step back.

09:58:06 1 Title I and all of the programs that go alongside the  
 2 grant.  
 3 Q. Is that an administrative position at the  
 4 school?  
 5 A. It is not an administrative position, but it  
 6 is out-of-classroom position. So you do kind of manage  
 7 and work with adults through that position.  
 8 Q. Did you hold any other positions at that  
 9 school?  
 10 A. I did not.  
 11 Q. After that, you went to Catholic University,  
 12 correct?  
 13 A. During that time I was at Catholic  
 14 University, yes.  
 15 Q. Then after Catholic University, you returned  
 16 to Prince George's County Public Schools: correct?  
 17 A. Correct, yes.  
 18 Q. And remind me where it was that you started  
 19 working?  
 20 A. Started work where?  
 21 Q. Yes.  
 22 A. Oxon Hill Middle School. Oxon Hill Middle

09:55:46 1 School was my first.  
 2 Q. Again?  
 3 A. Yes. You're saying after Catholic?  
 4 Q. Yes, after Catholic.  
 5 A. No. After Catholic, it was back to Charles  
 6 Carroll.  
 7 Q. Back to Charles Carroll.  
 8 A. Yes.  
 9 Q. During what dates did you work at Charles  
 10 Carroll?  
 11 A. It was -- I was there literally for a year,  
 12 so I had to say 2013 -- the school year 2013-2014.  
 13 Q. What positions did you hold there during  
 14 that time?  
 15 A. Just the Title I coordinator.  
 16 Q. So in total for how many years were you  
 17 Title I coordinator between your earlier stint at Charles  
 18 Carroll and your later stint?  
 19 A. Essentially just a year. Just one school  
 20 year.  
 21 Q. Then after Charles Carroll, where did you  
 22 work?

10:01:19 1 safe and orderly environment for all of my students, be a  
 2 liaison between the school and the community, and to  
 3 ensure best practices in all capacities.  
 4 Q. Great.  
 5 A. The list can keep going, but those are my  
 6 essential roles.  
 7 Q. So going forward, most of my questions will  
 8 be limited to the time period of fall 2014 until summer  
 9 2016, and that's because you started at Friendly in 2014.  
 10 A. Correct.  
 11 Q. And summer 2016 was when Miss Eller  
 12 transferred out of Friendly High School. So if there are  
 13 any other time periods that I want you to keep in mind  
 14 for specific questions, I'll let you know.  
 15 A. Okay.  
 16 Q. So as an assistant principal at Friendly,  
 17 what electronic devices did you use to maintain  
 18 electronic files like spreadsheets, Word documents or  
 19 other notes?  
 20 A. To maintain electronic files.  
 21 I'm going to say Google docs. I would  
 22 say the whole Google suite. I would say.

09:59:46 1 A. The wonderful Friendly High School.  
 2 Q. What positions did you hold at Friendly?  
 3 A. That was my first assistant principal role.  
 4 It was my first and only assistant principal role.  
 5 Q. Did you -- were you also a teacher or only  
 6 an assistant principal?  
 7 A. Only assistant principal.  
 8 Q. What years were you at Friendly as assistant  
 9 principal?  
 10 A. 2014 to 2018. So four years total.  
 11 Q. And after Friendly, where did you work?  
 12 A. I became principal at St. James Gholson  
 13 Middle School.  
 14 Q. And you are currently in that position?  
 15 A. Correct. Yes.  
 16 Q. So that would have been from 2018 to  
 17 present?  
 18 A. Yes.  
 19 Q. What are your duties as principal?  
 20 A. Everything.  
 21 Mainly to manage the building, supervise  
 22 curriculum and instruction throughout the school, secure

10:02:28 1 Q. How did you access the Google suite?  
 2 A. Through e-mail. So I -- our Google is  
 3 attached to our e-mail.  
 4 Q. But in terms of devices, did you access it  
 5 through a phone, a computer?  
 6 A. Oh, mainly through the computer. Laptop.  
 7 Laptop and desktop.  
 8 Q. How about a phone?  
 9 A. No.  
 10 Q. Did you ever save any of these Google docs  
 11 to the local hard drive of the computer?  
 12 A. I did not.  
 13 Q. Did you ever use an iPad to access Google  
 14 docs?  
 15 A. I did, yes.  
 16 Q. Did you ever save any of these Google docs  
 17 to the local storage on the iPad?  
 18 A. I did not.  
 19 Q. Do you know how long those files were kept  
 20 on the Google system?  
 21 A. They're still kept on the Google system. It  
 22 doesn't go away until you delete them, so.

10:03:48 1 Q. Great. The laptop and desktop that you  
 2 referred to, were those PGCPSS laptops and desktops?  
 3 A. Yes, they were.  
 4 Q. How about the iPad?  
 5 A. iPad was also.  
 6 Q. Do you still maintain those same  
 7 laptop/desktops and iPads?  
 8 A. I do not.  
 9 Q. When did you stop being in possession?  
 10 A. So the desktop belonged to the school, so  
 11 that remained at the school. The laptop also remains --  
 12 didn't remain. It was upgraded, so that went back to the  
 13 County.  
 14 Q. And the iPad?  
 15 A. The iPad belonged to the school.  
 16 Q. Great. So when you transferred to Gholson  
 17 is when you stopped using the desktop and the iPad?  
 18 A. That's correct.  
 19 Q. Was it your practice to delete files off of  
 20 these devices regularly?  
 21 A. No.  
 22 Q. Did you ever delete files off of the Google

10:05:59 1 Q. Got it. Did you use any work e-mail before  
 2 fall 2014, before you were at Friendly?  
 3 A. Yes.  
 4 Q. And you used e-mail throughout the time you  
 5 were at Friendly?  
 6 A. Yes.  
 7 Q. Did you use electronic files for work before  
 8 you were at Friendly?  
 9 A. Yes.  
 10 Q. And did you use electronic files throughout  
 11 the time you were at Friendly?  
 12 A. Yes, for various reasons, yes.  
 13 Q. Do you know of any reason why your e-mail  
 14 that you used while you were at Friendly would not be  
 15 available today?  
 16 A. No.  
 17 Q. Do you know of any reason why the files that  
 18 you used while you were at Friendly or created while you  
 19 were at Friendly would not be available today?  
 20 A. No.  
 21 Q. Now, other than your personal cell phone,  
 22 did you use any personal device to send -- any other

10:04:46 1 suite?  
 2 A. No.  
 3 Q. Other than these three devices, did you use  
 4 any other devices to maintain electronic files?  
 5 A. Not that I can recall, no.  
 6 Q. And as an assistant principal at Friendly,  
 7 what electronic devices did you use to correspond using  
 8 your PGCPSS e-mail addresses?  
 9 A. That varied between my personal cell phone,  
 10 and mainly the laptop and desktop.  
 11 Q. How about that iPad?  
 12 A. No.  
 13 Q. So you had Prince George's County Public  
 14 School e-mail synced to your personal phone?  
 15 A. Yes.  
 16 Q. Was it your practice to delete e-mails from  
 17 your in-box regularly?  
 18 A. No.  
 19 Q. Did you archive, as a matter of standard  
 20 practice, the e-mails that you received?  
 21 A. I don't delete any e-mails. They just stay  
 22 in my mail in-box.

10:06:53 1 personal device to send PGCPSS e-mails or conduct  
 2 business?  
 3 A. No.  
 4 Q. And did you keep paper documents during the  
 5 period you were assistant principal at Friendly?  
 6 A. Yes, for various reasons, yes.  
 7 Q. What were some of those reasons?  
 8 A. Mainly to accurately record events that may  
 9 have occurred with teachers, with students, with parents.  
 10 Any documentation that can assist in making sure that we  
 11 are giving a child the correct services and documenting  
 12 those services that a child may need, whether it be for a  
 13 letter of recommendation, whether it be for doctor's  
 14 notes that we have to keep on file. Just things of that  
 15 nature.  
 16 Q. All right. How about student discipline  
 17 reports?  
 18 A. Yes.  
 19 Q. Did you ever print out e-mails in paper  
 20 form?  
 21 A. It depends on sometimes; so a teacher sent a  
 22 note or an e-mail in reference to whether it be a

25

10:06:02 1 discipline or whether it be to a situation that may have  
2 occurred, I may have attached that to that and put that  
3 in that child's file.  
4 Q. All right. So just to make sure I'm  
5 understanding, if a teacher reported some situation with  
6 a student behavior, you might have printed it out and put  
7 that e-mail in the student's file as a record?  
8 A. Put it in the e-mail or attached it to a  
9 referral or whatever, yes.  
10 Q. How about complaints against faculty or  
11 staff?  
12 A. No.  
13 Q. Policy memos from the central  
14 administration?  
15 A. No.  
16 Q. So I'm going to go one by one through some  
17 of these documents that we just talked about to get a  
18 sense of what the procedure were for storages.  
19 A. Okay.  
20 Q. So for student discipline reports, what was  
21 your procedure when you received a discipline report?  
22 A. My procedures?

27

10:06:02 1 A. I did not. So that went to the guidance  
2 office, and either the registrar or the guidance  
3 counselor would be the ones to actually file that.  
4 Actually, I take that back. Not the  
5 registrar, the guidance -- secretary or the guidance  
6 counselor.  
7 Q. Did you give it to the guidance secretary?  
8 A. No, we used to put it in her mailbox or her  
9 Dropbox.  
10 Q. And then the guidance secretary would be the  
11 one who had the responsibility to put it in the student's  
12 file?  
13 A. That's correct.  
14 Q. Was there always a guidance secretary at  
15 Friendly High School while you were an assistant  
16 principal?  
17 A. Ah -- that's a good question. Yes, there  
18 was.  
19 Q. Were student discipline reports ever  
20 electronic?  
21 A. What do you mean in the sense of electronic?  
22 Q. So I assume since we're talking about paper

26

10:08:54 1 Q. Yes.  
2 A. Specifically, my procedure was I would  
3 always check with the teacher first and make sure we've  
4 gotten exact clarity on the situation. One of our  
5 practices were to make sure that the teacher contacted  
6 that child's parent or guardian to ensure they did that  
7 because it was not our role to allow the parent to hear  
8 from us first about a situation that occurred from  
9 someone else.  
10 Make sure that after we spoke with the  
11 teacher, we refer to the code of conduct or what we call  
12 the Student's Rights and Responsibility Handbook, and  
13 gave whatever appropriate consequence that was warranted  
14 from the action that the child may have done.  
15 Q. What would you do with the report itself  
16 that the teacher submitted?  
17 A. The report itself would be filled out by me.  
18 I would have to document whatever the action steps that  
19 were taken. That would, therefore, get a copy to the  
20 teacher and also a copy goes into the child's file.  
21 Q. Did you personally put the copy in the  
22 child's file?

28

10:11:04 1 documents, some student discipline reports were filled  
2 out by hand and given to you?  
3 A. Yes.  
4 Q. And so I'm asking if there was ever a system  
5 at Friendly in which the teacher would fill out the  
6 student discipline form, but online.  
7 A. No. There was no online form. The only  
8 thing electronically, they would get an electronic  
9 version of the, what we called the PS74, the referral;  
10 and they can type into it, but they would still have to  
11 print that out and sign off on it and send it back to us.  
12 I just wanted to clarify what you meant by electronic.  
13 Q. Sure.  
14 And just so that we're all on the same  
15 page, when you say and when I say student discipline  
16 report, I'm also referring to the PS74; is that your  
17 understanding?  
18 A. Yes. Yes.  
19 Q. When you say referral, is that the same  
20 document; is that your understanding?  
21 A. Yes.  
22 Q. Great. And these PS74s, after the guidance

29

10:11:50 1 secretary put them in the student's file, were they sent  
2 to anyone else?  
3 A. No. They just stay in the student's file,  
4 and essentially that's it. Because it's high school, the  
5 file is there unless a college requested it or it goes  
6 into the warehouse where it's stored.  
7 Q. So the guidance counselor wouldn't send a  
8 copy of the PS74, the completed PS74 to the teacher?  
9 A. So that would be my role. So I could say my  
10 practice was after -- whatever the discipline that was  
11 warranted, I would sign off on it, saying this is what  
12 the discipline is, and then I would not necessarily  
13 always hand it to the teacher, I would place it in their  
14 mailbox also, so they could have a copy of what happened,  
15 what the discipline was for the child.  
16 Q. So you placed let's say one copy in the  
17 teacher's mailbox and another copy in the guidance  
18 counselor's mailbox or gave it to the guidance secretary?  
19 A. Both, yes.  
20 Q. And then she or he would place it in the  
21 student's file?  
22 A. That's correct.

30

10:12:40 1 Q. Did the PS74 go to anyone else other than  
2 the teacher and the guidance secretary?  
3 A. No. No.  
4 Q. So the parents, for example, wouldn't  
5 receive a copy of it?  
6 A. No, they wouldn't, unless they requested it,  
7 but no.  
8 Q. And the PS74, as you mentioned, were placed  
9 in the students' files. Were these students' files ever  
10 sent to Prince George's County Public Schools, or were  
11 they maintained at Friendly? Where were the files  
12 stored?  
13 A. They were maintained at Friendly, and  
14 because like I said it's high school, the file doesn't go  
15 anywhere else unless requested by a college or  
16 University; and if not, they're stored in the warehouse.  
17 So after the students graduate, there's a warehouse where  
18 the files go to.  
19 Q. Is this a Friendly High School warehouse or  
20 a PGCPSS?  
21 A. PGCPSS.  
22 Q. Do you know how long after a student's -- a

31

10:13:43 1 student graduates, Friendly High School, sent the files  
2 over to the warehouse?  
3 A. I do not know that. I do not.  
4 Q. Were any of these student files ever thrown  
5 away?  
6 A. No. Not to my knowledge, not at all.  
7 Q. Other than the instance in which the student  
8 file would be sent to the warehouse, was there any way to  
9 transmit the discipline imposed on a student to Prince  
10 George's County Public Schools?  
11 A. So you're saying how did we document? If a  
12 child was written up on a referral, how was that  
13 documented with Prince George's County Public Schools?  
14 Q. Right.  
15 A. No. So that would only be transferred if it  
16 was warranted of a suspension; and therefore, that would  
17 go into the system. Otherwise, if it's just they went to  
18 in-school suspension or if they went to detention or if  
19 they had to serve another type of consequence; otherwise,  
20 no. The only ones that were transferred into the system  
21 were just suspensions.  
22 Q. Out-of-school suspensions?

32

10:15:03 1 A. Out-of-school suspensions, correct, yes.  
2 Q. Now, when you say "transferred into the  
3 system," can you explain what that means?  
4 A. Yeah. So we can document specifically if a  
5 child has been placed on the out-of-school suspension or  
6 another type of consequence, as it relates to their  
7 conduct via our SchoolMAX, which is our student -- I  
8 don't have the specific reference for it, but the student  
9 data system. It does everything for the school, so.  
10 Q. So this is like an online -- like a website?  
11 A. It's online, yes. Uh-huh.  
12 Q. It's maintained by Prince George's County  
13 Public Schools?  
14 A. Correct, yes.  
15 Q. So if punishment was detention, for example,  
16 that would not get uploaded?  
17 A. No, that would not be uploaded, no.  
18 Q. Did you retain any paper documents from your  
19 time as assistant principal at Friendly?  
20 A. Yes.  
21 Q. What documents?  
22 A. Mainly professional development documents,

10:15:59 1 things that helped further my professionalism and build  
2 my capacity, mainly for the most part.  
3 Q. So, like training for you, training  
4 documents?  
5 A. Trainings, yes. And trainings that I have  
6 received or trainings that I may have conducted myself.  
7 Q. Other than trainings, any other documents?  
8 A. No.  
9 Q. When did you first come to know Miss Eller?  
10 A. I came to first know Miss Eller -- I want to  
11 say my third or fourth day of reporting to Friendly High  
12 School. Yeah. My third or fourth day, when I finally  
13 had a chance -- I was over top the English department,  
14 essentially -- initially. And I met her during our  
15 collaborative plan, yes.  
16 Q. Did you know that Miss Eller was transgender  
17 before you started working at Friendly?  
18 A. I did not.  
19 Q. When did you learn that Miss Eller was  
20 transgender?  
21 A. Truthfully, I don't remember. I don't know  
22 if it was a conversation with Miss Eller. I don't -- I

10:15:29 1 ahead of us here, which is totally fine.  
2 A. Okay.  
3 Q. We'll get there.  
4 A. Okay.  
5 Q. But so I guess before that moment, did you  
6 reach out when you first learned?  
7 A. No.  
8 Q. Okay?  
9 A. No.  
10 Q. Did anyone from Prince George's County  
11 Public Schools reach out to you when you first started?  
12 A. No.  
13 Q. Before you worked with Miss Eller, had you  
14 ever worked with anyone who you knew to be transgender?  
15 A. Yes.  
16 Q. When was that?  
17 A. I could say high school. We had a couple of  
18 transgender students that attended my high school, and  
19 also upon me working in college had a transgender  
20 colleague as well.  
21 Q. When you were working at college?  
22 A. In college, yes.

10:17:16 1 don't recall. I don't recall.  
2 Q. Okay. Do you recall if, when you learned  
3 that she was transgender, if you reached out to anyone at  
4 Prince George's County Public Schools about training or  
5 advice on how to relate to a transgender colleague?  
6 A. So I'm going to say -- I know we're on  
7 record, but to quote me, I'm going to say yes and no at  
8 the same time. I remember a specific incident where, I  
9 want to say maybe at the end of the first year,  
10 something, a situation had occurred with a student or  
11 with a colleague. I can't remember specifically.  
12 But I remember Miss Eller requesting us  
13 to do some type of equity training, and I can't remember  
14 if myself -- if I myself reached out to -- I don't even  
15 know what the office is called, the equity office -- I'm  
16 making that up; I don't know the correct name title for  
17 it -- or the principals reached out; but I do remember  
18 having that conversation with Miss Eller about that.  
19 Q. Okay.  
20 A. But I can't recall what the next steps were,  
21 at all.  
22 Q. All right. I think you're getting a little

10:18:20 1 Q. Where was this?  
2 A. I was working at Florida Restaurant  
3 Association.  
4 Q. Did Florida Restaurant Association provide  
5 any training about diversity or inclusion issues for  
6 transgender people?  
7 A. No.  
8 Q. At the time, did you take any steps to  
9 educate yourself about diversity or inclusion for  
10 transgender people?  
11 A. No.  
12 Q. Since working with Miss Eller, have you  
13 worked with anyone else who you know to be transgender?  
14 A. No.  
15 Q. All right. While you were an assistant  
16 principal at Friendly High School, did Prince George's  
17 County provide you with any training?  
18 MR. SHARMA: Objection. If you  
19 understand the question, you can answer.  
20 A. So I --  
21 MR. SHARMA: Was there specific training  
22 he was referring to.

10:20:14 1 A. Yeah, that's what I -- what specific  
2 training are you referring to? Trainings in general or  
3 just trainings pertaining to equity?  
4 Q. Well, we can -- well, we can narrow down  
5 from there. Any trainings pertaining to a diverse  
6 population of faculty or staff?  
7 A. No.  
8 Q. As an assistant principal, if you wanted to,  
9 would you have requested from Principal Adams that  
10 training that was not already being provided to you be  
11 instituted?  
12 A. Can you repeat that again.  
13 Q. Yeah. So when you were an assistant  
14 principal, could you have requested Principal Adams to  
15 institute any training that had -- that was not already  
16 being provided?  
17 A. Yes, I could have requested that from him,  
18 yes; but that would have been per his approval.  
19 Q. Sure.  
20 Could you have requested that directly  
21 from Prince George's County Public Schools?  
22 A. I would say yes; but again, that would have

10:22:38 1 Q. What were your duties with regard to  
2 students?  
3 A. My duties in regard to students were to  
4 ensure first of all, that they were being taught.  
5 Second thing is to make sure that they  
6 were given a safe and secure environment. I hate to  
7 sound so cliché, but that's very beneficial.  
8 And I would say the third big thing is  
9 to make sure that they were also being treated fairly.  
10 Q. Being treated fairly by whom?  
11 A. By all.  
12 Q. Did you have a duty to deal with student  
13 behavioral issues while you were --  
14 A. Yes.  
15 Q. -- assistant principal?  
16 A. Absolutely.  
17 Q. Was it primarily the responsibility of  
18 assistant principals or the principal to deal with  
19 student behavioral issues?  
20 A. That was kind of interchangeable, but mainly  
21 the assistant principal.  
22 Q. How many assistant principals were there at

10:21:03 1 to fall back on the principal's approval.  
2 Q. Did you receive any diversity training while  
3 you were assistant principal at Friendly that included a  
4 component on transgender status or gender identity?  
5 A. No. Not that I can recall.  
6 Q. So as an assistant principal at Friendly,  
7 what were your duties with regard to teachers,  
8 specifically?  
9 A. My duties were to supervise the grade level  
10 teachers that I was over top of. Also, the content that  
11 I also was over top, as well as to ensure curriculum  
12 instruction was a priority, and also to ensure the  
13 success of all kids, to generalize.  
14 Q. Did one of your duties include ensuring a  
15 healthy work environment for the teachers that you  
16 supervised?  
17 A. Always. And I would say that would be based  
18 upon my expectations.  
19 Q. Did this work -- healthy work environment  
20 include a work environment free of harassment and  
21 discrimination?  
22 A. Yes.

10:24:00 1 Friendly while you were assistant principal?  
2 A. In my total tenure there, or just the time  
3 in which we are referring?  
4 Q. During your total tenure at Friendly as  
5 assistant principal?  
6 A. Okay. It varied. So my first year there  
7 was four; and then after that, we went to three.  
8 Q. And they all had the same duties, roughly.  
9 A. Yes. For the most part, yes.  
10 Q. Did these duties change during your time as  
11 assistant principal? Did you take on more  
12 responsibilities or less responsibilities?  
13 A. I would say yeah. When we knocked down one  
14 of, we all took on a little bit more, yes.  
15 Q. In terms of the subject matter, your  
16 responsibilities, did those remain the same or did those  
17 change?  
18 A. Remained the same for the most part.  
19 Q. How were the duties for dealing with student  
20 behavioral issues divided between assistant principals?  
21 A. They were divided based upon the grade  
22 level. So whatever grade level the administrator was up

10:25:05 1 over top of it, is the blend that the administrator gave  
 2 specifically for that grade level.  
 3 Q. What was your grade level?  
 4 A. I was ninth grade.  
 5 Q. Did you ever deal with student behavioral  
 6 issues of students outside of the grade that you were  
 7 assigned to?  
 8 A. Yes.  
 9 Q. So even though your grade level was ninth  
 10 grade, you had the ability to impose discipline on a  
 11 student outside that grade level?  
 12 A. That is correct, yes.  
 13 Q. How did that happen? How was a student that  
 14 was outside your grade level referred to you?  
 15 A. So one of the main factors is in the absence  
 16 of one of the other administrators, we would take on  
 17 that, or if something occurred in our presence or we were  
 18 able to do it, we dealt with it respectfully and  
 19 communicated that to the grade level administrator.  
 20 Q. Did teachers sometimes report behavioral  
 21 issues to you even if a student was not in your grade?  
 22 A. Yes.

10:26:39 1 A. So '15-'16 was a school year, but I would  
 2 literally say maybe four or five months. School's not  
 3 that long, but about four -- four months, I would say, I  
 4 was on top of English.  
 5 Q. Okay. And you've been social studies ever  
 6 since, or until 2016?  
 7 A. Yes.  
 8 Q. Now, you stated that as assistant principal  
 9 at Friendly, you dealt with student behavioral issues.  
 10 As a general matter, would you personally determine  
 11 whether to impose discipline and determine the level of  
 12 discipline, or would you direct others to do so?  
 13 A. Can you repeat that again.  
 14 Q. Sure. When -- you stated that you had --  
 15 you dealt with student behavioral issues at Friendly.  
 16 Did you personally determine the  
 17 discipline to impose, or did you direct others to make  
 18 that determination?  
 19 A. That's subjective. It depended upon if it  
 20 was my grade level. I would not personally make a  
 21 decision; the decision would come based upon what the  
 22 handbook states for the consequence. If it was something

10:28:00 1 Q. And did Principal Adams sometimes direct you  
 2 to deal with behavioral issues of students who were not  
 3 in the grade assigned to you?  
 4 A. Yes.  
 5 Q. And you mentioned that you had a duty  
 6 regarding content --  
 7 A. Yes.  
 8 Q. -- as an assistant principal. Did this  
 9 include a duty to oversee different departments?  
 10 A. That's correct.  
 11 Q. What departments did you oversee while you  
 12 were at Friendly?  
 13 A. My departments were -- I started off with  
 14 English. Then I transitioned to social studies.  
 15 Q. What years were you the department  
 16 supervisor, grade level or department supervisor for  
 17 English?  
 18 A. For English. English was just my first  
 19 year. So the 2014-'15 school year; and then in the  
 20 middle of the year, actually switched over to social  
 21 studies.  
 22 Q. In '15?

10:29:53 1 that was not part of one of my grade level students, I  
 2 would therefore impose that discipline upon their grade  
 3 level administrator.  
 4 Q. So just to be clear, if it was your grade  
 5 level, you would be the one who would interpret what the  
 6 Student Handbook required?  
 7 A. Correct.  
 8 Q. And if it was not your grade level, you  
 9 referred it to the --  
 10 A. The grade level administrator, if they were  
 11 present. Let me put it that way. If they were not,  
 12 therefore, I would do it, I would take care of the  
 13 situation.  
 14 Q. It was the same process. It was  
 15 interpreting what the student code of conduct required?  
 16 A. Yes. Absolutely, yes.  
 17 Q. How much interpretation leeway did the  
 18 student code allow you in terms of imposing discipline?  
 19 A. I mean, there really wasn't too much leeway.  
 20 It's verbatim. You know, it is -- this is what it is,  
 21 this is what the consequence is, or this is the  
 22 infraction and this is what the consequence should be.

16:26:44 1 Q. Okay. Did the Student Handbook give you  
 2 different options in terms of what discipline to impose  
 3 for a specific type of conduct?  
 4 A. It does give you options, but it's based  
 5 upon the severity of the infraction.  
 6 Q. Got it. Now, did the assistant principals  
 7 also deal with student behavioral issues that were  
 8 violations of -- or that were harassing or discriminating  
 9 behavior?  
 10 A. Did all assistant principals?  
 11 Q. Sure. Was it their role to deal with  
 12 situations of harassment or discrimination?  
 13 A. Yes, it was.  
 14 Q. Would this include determining the  
 15 discipline for students accused of harassing or  
 16 discriminating against a teacher?  
 17 A. Yes.  
 18 Q. If that harassment by a student included  
 19 discriminatory language, would you address those  
 20 incidents?  
 21 A. Yes.  
 22 Q. Was your standard procedure for addressing

10:31:02 1 Q. We're handing you a document that has been  
 2 previously marked as Exhibit 32.  
 3 (Plaintiff's Exhibit 32, Administrative Procedure,  
 4 Discrimination and Harassment, PGCPS 679-700, was  
 5 presented.)  
 6 Q. I'm going to ask you to review it and once  
 7 you're done, I'll ask you a couple of questions about it:  
 8 A. Okay. Okay.  
 9 Q. Have you seen this document before?  
 10 A. Yes.  
 11 Q. This document is administrative policy 4170;  
 12 correct?  
 13 A. Yes, it is.  
 14 Q. When did you receive it?  
 15 A. So say more recently, in my role of  
 16 principal, I have paid close attention to this, so.  
 17 Q. Do you know if you received it when you were  
 18 an assistant principal at Friendly or before that time?  
 19 A. I did not receive this, but these admin  
 20 procedures are available online, and it's on a  
 21 case-by-case basis. So you kind of refer to the thousand  
 22 admin procedures there are based upon the situation or

10:28:53 1 reports of student harassment of a faculty member  
 2 different than the procedure you used for addressing  
 3 reports of other types of misbehavior?  
 4 A. No.  
 5 MR. SHARMA: Objection. You may answer.  
 6 A. No. There was no difference.  
 7 Q. Was your standard procedure for addressing  
 8 reports of student harassment of a faculty member any  
 9 different if these reports included discriminatory  
 10 language or activity?  
 11 A. No.  
 12 Q. Was your procedure for recording any  
 13 discipline responding to reports of harassment or  
 14 discrimination against a teacher any different than the  
 15 procedure we discussed earlier regarding the PS74s?  
 16 A. No.  
 17 Q. Now, does Prince George's County Public  
 18 Schools have a written policy prohibiting discrimination  
 19 against people who are transgender because of their sex,  
 20 gender identity or transgender status?  
 21 A. I can't tell you the answer to that yes or  
 22 no, but I would assume that they do.

10:32:35 1 the circumstance.  
 2 Q. So this document was available online to the  
 3 best of your knowledge?  
 4 A. As of the date of September 1, 2000, I am  
 5 sure it was online.  
 6 Q. Great. Did you -- can you describe what  
 7 this administrative procedure is?  
 8 A. It's about discrimination, harassment  
 9 specifically, and the protocols and procedures for  
 10 discrimination and harassment.  
 11 Q. Did PGCPS ever train you on how to apply the  
 12 policy contained in this document?  
 13 A. Me, no.  
 14 Q. Do you know if Prince George's County Public  
 15 Schools as a matter of course trains school  
 16 administrators on how to apply the policy?  
 17 A. In my time, I have not seen this, so I'm  
 18 going to say no.  
 19 Q. Now, you mentioned that you've reviewed this  
 20 policy while you were principal at Sholson; correct?  
 21 A. Yes, yes.  
 22 Q. So you have some familiarity with it?

10:33:39 1 A. Correct.

2 Q. Do you know if this policy prohibits

3 discrimination and harassment perpetrated by students?

4 A. It does.

5 Q. So I'm going to read sub-paragraph a of the

6 definitions section on page 1, and ask you a few

7 questions about it.

8 A. Okay.

9 Q. Quote, "Harassment, the harassment of an

10 individual on the basis of his or her race, color, sex,

11 age, national origin, religion, marital status, sexual

12 orientation or disability is just as demeaning and

13 disrespectful as discriminating against an individual on

14 those bases. Harassment takes many forms, including but

15 not limited to the following."

16 Did I read that correctly?

17 A. Yes, you did.

18 Q. Now, when this policy defines harassment

19 with reference to the word sex, do you understand that to

20 include a person's gender identity or transgender status?

21 A. I do.

22 Q. At the time you were principal -- assistant

10:36:13 1 used slurs or otherwise insulted a person based on their

2 gender identity or transgender status that that action

3 could fall under this category of harassment?

4 A. I do now.

5 (Clarification requested by the Court Reporter.)

6 A. I do now.

7 Q. Did you at the time you were assistant

8 principal?

9 A. I do -- yes, I did. I mean I do -- I would

10 say because I was not too much familiar with this admin

11 procedure, but as I say, I do now and I understand this,

12 yes.

13 Q. Do you consider that if someone used the

14 incorrect gender when referring to a transgender person,

15 that that action could fall under this category of

16 harassment?

17 A. Yes.

18 Q. And same question for at the time you were

19 an assistant principal at Friendly?

20 A. Yes.

21 Q. Now, just for the record, sometimes I may

22 use the word misgender. When I use that term, I'm

10:35:00 1 principal at Friendly High School, did you understand

2 this reference to the word sex to include a person's

3 gender identity or transgender status?

4 A. I did.

5 Q. So I'm going to read sub-paragraph a1 which

6 is on page 2, which defines a category of harassment and

7 ask you a few questions about it. Quote, "Conduct that

8 has the purpose or effect of unreasonably interfering

9 with an employee's work or a student's education or

10 extracurricular performance based on the

11 employee's/student's race, color, sex, age, national

12 origin, religion, marital status, sexual orientation or

13 disability." End quote.

14 Did I read that correctly?

15 A. Yes, you did.

16 Q. Do you consider that if someone uses slurs

17 or otherwise insults a person based on their gender

18 identity or transgender status that that action could

19 fall under this category of harassment?

20 A. I do.

21 Q. At the time you were an assistant principal

22 at Friendly High School, did you consider that if someone

10:37:00 1 referring to using the incorrect gender when referring to

2 a person.

3 A. Correct. Right.

4 Q. And I'm going to read sub-paragraph a2,

5 which defines another category of harassment and ask you

6 a few questions about it.

7 "Conduct that has the purpose or effect

8 of creating an intimidating, hostile or offensive working

9 or educational environment based on race, color, sex,

10 age, national origin, religion, marital status, sexual

11 orientation or disability."

12 Did I read that correctly?

13 A. Yes, you did.

14 Q. And do you consider that if a person used

15 slurs or otherwise insulted a person based on their

16 gender identity or transgender status, that that action

17 could fall under this category of harassment?

18 A. Yes.

19 Q. Same question for at the time you were an

20 assistant principal at Friendly?

21 A. Yes.

22 Q. Do you consider that misgendering a

10:37:57 1 transgender person could create an intimidating, hostile  
 2 or offensive working environment?  
 3 A. Yes.  
 4 Q. Same question for at the time you were an  
 5 assistant principal at Friendly?  
 6 A. Yes.  
 7 Q. Now, I'm going to read the first part of  
 8 sub-paragraph b that's on the same page.  
 9 Quote, "Sexual harassment, in addition  
 10 to the type of behavior and conduct described above," end  
 11 quote; and then the sentence goes on.  
 12 Did I read that correctly?  
 13 A. Yes.  
 14 Q. And when the document says, "in addition to  
 15 the type of behavior described above," do you understand  
 16 that to include the two sub-paragraphs I previously read  
 17 and discussed with you, sub-paragraph a1 and a2?  
 18 A. I do.  
 19 Q. Now, on page 8, there is a paragraph, Roman  
 20 numeral IX that states, related procedures,  
 21 administrative procedure 10101 and code of student  
 22 conduct; correct?

10:41:02 1 A. Yes, it is, for 2014-2015, yes.  
 2 Q. All right. And does this contain the code  
 3 of student conduct that applied at that time?  
 4 A. Yes.  
 5 Q. And as an assistant principal, I assume you  
 6 were familiar with the code of student conduct?  
 7 A. Very much so.  
 8 Q. What did you use the code of student conduct  
 9 for?  
 10 A. Mainly discipline and infractions based upon  
 11 students and consequences.  
 12 Q. So I want to go step by step with you on how  
 13 you would determine what violation occurred and what  
 14 discipline to impose. Okay?  
 15 A. Okay.  
 16 Q. So if we could turn to pages or page 14,  
 17 there we see that the page discusses different levels of  
 18 discipline that can be imposed on students; correct?  
 19 A. Correct.  
 20 Q. And it goes from level 1 through level 5.  
 21 A. Yes.  
 22 Q. Correct?

10:59:16 1 A. Correct.  
 2 Q. Do you know if the code of student conduct  
 3 incorporates the prohibition on discrimination and  
 4 harassment outlined in the administrative policy?  
 5 A. As off the top of my head, I can't tell you  
 6 yes or no; but I do believe it addresses it. I don't  
 7 know what it says verbatim, but I do know that it  
 8 addresses the topic and the issue.  
 9 Q. So you know it addresses the topic and the  
 10 issue, but you don't know if it incorporates the  
 11 definitions laid out in the administrative policy, even  
 12 if it uses different language?  
 13 A. No. I can't tell you what it says verbatim,  
 14 okay.  
 15 Q. Okay. We're handing you another document  
 16 which was previously marked as Exhibit 8. Please review  
 17 the document.  
 18 (Plaintiff's Exhibit 8, Student Rights & Responsibilities  
 19 Handbook, PGCPs 102-133, was presented.)  
 20 A. Okay.  
 21 Q. Is this the Student Rights and  
 22 Responsibilities Handbook?

10:42:07 1 A. Correct.  
 2 Q. And then from pages 15 through 18, is a  
 3 chart of different violations; correct?  
 4 A. That's correct.  
 5 Q. And the first column identifies a specific  
 6 violation and describes it.  
 7 A. Correct.  
 8 Q. And then the next column specifies different  
 9 grade levels; correct?  
 10 A. That is correct.  
 11 Q. Sometimes it is prekindergarten to fifth  
 12 grade, sometimes it is sixth grade to 12th?  
 13 A. Correct.  
 14 Q. And sometimes it is all grades; correct?  
 15 A. That is correct, yes.  
 16 Q. Then the next column is titled response  
 17 level, and it has a series of numbers; correct?  
 18 A. That's correct.  
 19 Q. And those series of numbers are the  
 20 different levels of punishment that can be imposed;  
 21 right?  
 22 A. That's correct.

10:43:05 1 Q. So can you describe from the moment that you  
2 received a report of a student misbehavior, the steps  
3 that you took, based on this code of student conduct, to  
4 determine what type of violation it was and what  
5 punishment to impose?

6 A. Yes.

7 So what we would do, is if I were to  
8 receive a, a write-up or a PS74 from the teacher, I would  
9 make sure I would read that thoroughly. A lot of times,  
10 I would tell you we would have to give the PS74 back to  
11 the teacher so that they would reward it so that it's not  
12 personal, so it's just stating specifically the fact of  
13 what did occur, so that we can go back and reference it  
14 to what the specific violation was.

15 I'd look at the steps that the teacher  
16 took, referencing that back to the levels of which they  
17 said. So if it was a simple thing as a disrespect  
18 towards a teacher, somebody may have said an  
19 inappropriate word to a teacher, a curse word for  
20 example.

21 Q. Mm-hmm.

22 A. We would warrant whatever level it says. So

10:44:44 1 and the response levels identified in this chart, you  
2 would determine the appropriate punishment: correct?

3 A. That is correct.

4 Q. So for example, for disrespect, we see that  
5 the grade level on the second column is all grades, and  
6 that the appropriate response level is 1, 2, or 3?

7 A. That is correct.

8 Q. And so if we go back to page 14, we see that  
9 within level 1, there are different types of  
10 interventions that can be imposed; correct?

11 A. That is correct.

12 Q. How would you decide between the different  
13 options in level 1, which one of them to apply?

14 A. Again, it goes based upon the severity of  
15 the case. If it was just blatant disrespect, if it was a  
16 slip-up. It depends on what it was. A teacher can say,  
17 you know, Kevin was cursing to -- cursed in my classroom.  
18 You know, it wasn't disrespect towards you. It may have  
19 been towards another student. It may have just been a  
20 conversation the child was having. So that would warrant  
21 the intervention.

22 If it was a blatant disrespect, if a

10:44:01 1 If it's a level 1, 2, or 3, we would therefore take the  
2 steps, have you contacted the parent, have you done X, Y  
3 and Z, you know.

4 And then from there issue whatever the  
5 consequence is based upon the level and the response --  
6 based upon the facts that the teacher gave us on that  
7 referral.

8 Q. So you used the example of disrespect.

9 A. Yes.

10 Q. So I believe that's on page 16.

11 A. Okay.

12 Q. The second violation in the first column is  
13 disrespect towards others; right?

14 A. That's correct.

15 Q. Am I correct in saying that the first thing  
16 that you would do would be to determine the violation  
17 that applied?

18 A. Determine the violation that applied,  
19 correct, according to what was written on the referral.

20 Q. Right.

21 A. Yes.

22 Q. And then, based on the student's grade level

10:45:54 1 child just decided they were going to be completely  
2 blatantly disrespectful to you, then that would warrant  
3 another type of consequence and the intervention needed.

4 Q. Got it. So within level 1, for example, you  
5 had some leeway to determine which punishment to impose?

6 A. Based upon the information that was  
7 provided, yes.

8 Q. Right.

9 A. Yes.

10 Q. And the same thing for level 2, level 3,  
11 level 4, level 5, there is always multiple options to  
12 choose from?

13 A. Correct.

14 Q. Now, how would you choose whether to impose  
15 a punishment outlined by level 3, versus level 2, versus  
16 level 1?

17 A. Okay. One of the things that I put in place  
18 personally -- and this was not district policy because we  
19 work with children and we're trying to teach them how to  
20 be productive citizens. You know, we would tell the  
21 teachers to make sure a child understands why they are  
22 getting this infraction specifically.

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16:46:48 1 So it would be based upon the frequency  
2 of it, if it was a one and done. Yes, we're going to  
3 write it up. Yes, I want you to document it; but I also  
4 want you to make sure that we address the situation and  
5 let that child know this is why -- if we talk about  
6 disrespect and appropriate language, why we don't use  
7 this in our type of class.  
8 If it's something that is a continual  
9 process and the frequency is consistent, therefore it  
10 would warrant a different level, so that usually would go  
11 up to a level 3.  
12 Q. Got it. So if a student -- if this was the  
13 first time that a student had committed that specific  
14 violation, odds are they would have been given a lower  
15 level of punishment than if it was frequently recurring?  
16 A. That's correct.  
17 Q. Okay. Can you define the term, quote, "to  
18 code a violation, conduct or behavior with regard to  
19 violations of the student code of conduct"?  
20 A. Can you explain that to me?  
21 Q. Yeah. Do you know what the phrase "to code"  
22 means, to code a specific type of behavior?

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10:46:53 1 Q. Yes. So this would also prohibit behavior  
2 from -- by students against adults; correct?  
3 A. Yes.  
4 Q. And on the bottom of that page, there's a  
5 section titled sexual harassment; correct?  
6 A. Yes.  
7 Q. Now, I'm going to ask you to review that  
8 paragraph, or those two paragraphs.  
9 A. Okay.  
10 Q. Would you agree that the first paragraph  
11 defines what sexual harassment is?  
12 A. I do. I do, yes. I agree.  
13 Q. I'm going to read the last sentence of the  
14 first paragraph, and just ask you a couple of questions.  
15 A. Okay.  
16 Q. Quote, "Sexual harassment also includes acts  
17 that are not overtly sexual, but rather are directed at  
18 individuals based on their gender, such as profanity or  
19 rude behavior that is gender-specific," end quote.  
20 Did I read that correctly?  
21 A. Yes, you did.  
22 Q. Do you consider that if a student used slurs

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10:47:47 1 A. No.  
2 Q. No. Okay.  
3 Please turn to page 13. On the top of  
4 the page, there's a section titled "What is Bullying,  
5 Harassment or Intimidation"; correct?  
6 A. Yes.  
7 Q. Can you review that first paragraph.  
8 A. Okay.  
9 Q. After reviewing that first paragraph, would  
10 you agree that that first paragraph defines what  
11 constitutes bullying, harassment or intimidation?  
12 A. Yes.  
13 Q. Do you consider that a student -- that this  
14 would include instances of a student bullying, harassing  
15 or intimidating a teacher?  
16 A. Well, looking at the verbiage --  
17 Q. Mm-hmm.  
18 A. -- of the paragraph, it specifically deals  
19 with students.  
20 Q. Mm-hmm.  
21 A. But can that be transferred to dealing with  
22 adults? I would say yes, as well.

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10:50:54 1 or otherwise insulted a person based on a person's gender  
2 identity or transgender status, that that action could  
3 constitute sexual harassment as defined in the Student's  
4 Rights and Responsibilities Handbook?  
5 A. Yes.  
6 Q. Does that include instances in which a  
7 student acted that way against a teacher?  
8 A. Yes.  
9 Q. At the time you were an assistant principal  
10 at Friendly, did you share this view?  
11 A. Yes.  
12 Q. Do you consider that if a student  
13 misgendered a transgender teacher, that that action would  
14 constitute sexual harassment as defined in the Student's  
15 Rights and Responsibilities Handbook?  
16 A. Read that again.  
17 Q. Sure. Do you consider that if a student  
18 misgendered a transgender teacher, that that action would  
19 constitute sexual harassment as defined in the Student  
20 Rights and Responsibilities Handbook?  
21 A. No.  
22 Q. No.

10:51:46 1 A. No.

2 Q. Do you consider that if a student

3 misgendered a transgender teacher, that that action would

4 constitute bullying, harassment or intimidation?

5 A. I would say no.

6 And I say no because unless it's

7 intentional and the child makes it intentional, no.

8 Q. Okay. So then let me ask you this: Do you

9 consider that if a student intentionally misgendered a

10 transgender -- a teacher, that that action would

11 constitute sexual harassment as defined in the student's

12 Rights and Responsibilities Handbook?

13 A. In that case, yes.

14 Q. Do you consider that if a student

15 intentionally misgendered a transgender teacher, that

16 that action would constitute harassment, bullying or

17 intimidation?

18 A. Yes.

19 Q. And did you share this view when you were

20 assistant principal at Friendly High School?

21 A. Yes.

22 Q. Now, the last sentence on page 13 states,

10:54:18 1 person reporting the instance of bullying, harassment,

2 intimidation or sexual harassment, what did you do with

3 that form?

4 A. The form was therefore -- I don't want to

5 say the form, but the report, the -- the situation was

6 therefore investigated, and that could have been

7 investigated by myself, a guidance counselor or our

8 school police officers or security, or another

9 administrator; and therefore, we would follow up.

10 And then there's another form that we

11 use to report back what the investigation yielded.

12 Q. So there are -- okay.

13 So staying on this form for a moment,

14 where did you send this form?

15 A. It depended on the severity of the case. So

16 therefore the form would either stay with me, if it was

17 something that I could handle and investigate myself. If

18 it was beyond my control, it would go to whomever else it

19 needed to go to, whether it be security, the police

20 officer, or a counselor.

21 Q. Do you know if this form, after the

22 investigation was complete, stayed at Friendly High

10:53:04 1 quote, "Remember, all types of bullying, harassment or

2 intimidation are reported on the reporting form."

3 Correct?

4 A. Correct.

5 Q. Now, if you turn to page 29 of the handbook,

6 there's a form titled "Bullying, Harassment or

7 Intimidation Reporting Form"; correct?

8 A. Correct.

9 Q. Do you know if this is the reporting form

10 referenced in the section on sexual harassment that we

11 just read?

12 A. Yes. Yes, it is.

13 Q. Were you required to fill out one of these

14 forms if someone reported an instance of bullying,

15 harassment, intimidation or sexual harassment at school?

16 A. Yes.

17 Q. Did you always fill out one of these forms

18 on someone?

19 A. I did not. I had the person reporting it

20 fill it out either in my presence or amongst their own

21 time, and then they would bring it back to me.

22 Q. And once you received this form from the

10:55:29 1 School or left to PGSPS?

2 A. It's supposed to go to a specific office in

3 Prince George's County Public Schools. Don't get me

4 quoting the wrong one. It's in my e-mail, if I were able

5 to pull it up. It goes to a specific person where they

6 therefore document.

7 Q. Okay. So this form is supposed to leave

8 Friendly High School, unlike the PS74?

9 A. Yes. So it stays also. It can go in the

10 child's file also, to be clear. And then it also is sent

11 off to the office in which it's recorded.

12 Q. Got it.

13 Every time there was an instance of

14 bullying, harassment or intimidation, did you ask that

15 person reporting it to fill out one of these forms?

16 A. When it came to students, yes. Yes.

17 Q. And if the teacher had reported an instance

18 of bullying, harassment or intimidation, would you ask

19 them to fill out this form?

20 A. If it was in reference to a student, yes.

21 Q. Got it.

22 A. If it was in reference to a staff member,

10:56:20 1 no.

2 Q. Understood.

3 Now, you said there was a second form.

4 A. Yes.

5 Q. What is that second form?

6 A. It's called the Bullying and Harassment or

7 Intimidation Investigation Form.

8 Q. Okay. Can you describe that form for us?

9 A. It's very similar to this form. It just

10 literally talks about who is filling out, who is

11 completing the investigation and what the outcome of the

12 investigation is.

13 Q. And would the person investigating the

14 report, whether that be you or security or someone else,

15 fill out that form?

16 A. Yes.

17 Q. Did that form stay at Friendly?

18 A. That form should stay at Friendly with the

19 file, with the same form. So that form was attached to

20 this form, and it goes into the file with the -- if it's

21 a child's file, or therefore goes to the same office --

22 which you send the report form to.

10:58:08 1 A. Sent, yes.

2 Q. Do you know if that policy was always

3 followed?

4 A. I -- no, it was not always followed.

5 Q. Did you always follow the policy?

6 A. I did, yes.

7 Q. Do you know -- can you describe a couple of

8 instances in which it wasn't followed?

9 A. No.

10 Q. How do you know it wasn't always followed?

11 A. I can't say because some things did not

12 warrant an investigation because it was not considered to

13 be defined as bullying. So a child -- so say for

14 instance, a child may have filled this out saying that

15 they had been bullied or a parent may have reported that

16 a child was being bullied, but just upon having

17 background knowledge and other documentation to support

18 that it was not bullying, it was not followed in that

19 case.

20 So unless the situation actually yielded

21 bullying is where we continued out; but if it was a

22 retaliation, if it did not fall within the confines of

10:57:10 1 Q. Got it. So it stays at Friendly and goes?

2 A. Yes.

3 Q. Got it. Do you know if -- well, did you

4 ever deal with these forms while you were assistant

5 principal at Friendly?

6 A. Yes.

7 Q. Do you know who was responsible for sending

8 these forms to Prince George's County Public Schools?

9 A. I sent my own. I can't speak for anybody

10 else.

11 Q. By your own, you mean the one that you asked

12 the teacher to fill out and give back to you?

13 A. That's correct.

14 Q. Is there a policy in place for who is

15 supposed to send the forms out, irrespective of the fact

16 that you did it?

17 A. No, there's no policy. So usually, you just

18 take it upon yourself, whoever the investigator is or

19 whoever is reported to, usually just takes it upon

20 themselves to do it.

21 Q. But there is a policy to have these forms

22 delivered?

10:58:09 1 what bullying is, it was not investigated.

2 Q. Okay. So you know, my question was, if

3 there was a policy that these would be sent out. So --

4 and you said that the policy wasn't always followed.

5 So was the policy that every report,

6 whether it was substantiated or not, should be sent out?

7 A. No. There was not a policy for that, no.

8 Q. Okay. Was the policy that if a report was

9 substantiated and proven, that that would be sent out?

10 A. Yes.

11 Q. Great.

12 So --

13 A. So let me back up. To my knowledge, yes.

14 Q. Yes.

15 A. Okay.

16 Q. So if the policy was that every report that

17 was substantiated and proven was to be sent out, to your

18 knowledge, was that policy always followed?

19 A. Yes. To my knowledge, yes.

20 Q. Okay. Are you aware that the information

21 from this form is reported all the way up to the Maryland

22 General Assembly?

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11:00:02 1 A. I was not.  
 2 Q. Now, if you did not classify an incident as  
 3 bullying, harassment or intimidation, would it still be  
 4 reported on this form?  
 5 A. Yes, it still would be reported on the form,  
 6 yes.  
 7 MR. SHARMA: Can we take a break in  
 8 about five minutes? He said we need to.  
 9 MR. RODRIGUEZ: Yes. Actually, I just  
 10 have a couple of questions and we're going to take a  
 11 break anyways.  
 12 MR. SHARMA: Oh, okay. Perfect.  
 13 BY MR. RODRIGUEZ:  
 14 Q. If a teacher themselves filled out the form  
 15 reporting bullying, harassment or intimidation by a  
 16 student, would this be the form that they would fill out?  
 17 A. Yes.  
 18 Q. All right. And if the teacher reports that  
 19 they were the victims of discrimination by a student,  
 20 this is the form that they would fill out?  
 21 A. They should fill that out, yes.  
 22 Q. And every time a teacher reported an

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11:02:22 1 meant by it.  
 2 So if it warranted an investigation  
 3 because it was actual, substantiated evidence of being  
 4 bullying, yes. If it was not based upon, you know, prior  
 5 documentation and prior evidence of things, no.  
 6 Q. Okay. Perfect.  
 7 MR. RODRIGUEZ: And we can take a  
 8 five-minute break.  
 9 THE WITNESS: Awesome. Thank you, guys.  
 10 MR. RODRIGUEZ: Thank you.  
 11 (RECESS, 11:02 a.m. - 11:13 a.m.)  
 12 BY MR. RODRIGUEZ:  
 13 Q. I'm going to ask you a couple of questions  
 14 about training received by students since we already  
 15 talked about training received by faculty.  
 16 A. Okay.  
 17 Q. While you were an assistant principal at  
 18 Friendly High Schools, were the students provided  
 19 training on the code of student conduct?  
 20 A. Yes.  
 21 Q. Were the students provided training on  
 22 administrative policy 4150?

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11:09:27 1 instance of harassment against them by a student, you  
 2 asked them to fill out this form?  
 3 A. I did not always ask them to fill out this  
 4 form, no.  
 5 Q. No?  
 6 A. No.  
 7 Q. Okay. But there was a requirement that any  
 8 instance of harassment, bullying or intimidation be  
 9 reported on this form?  
 10 A. Yes.  
 11 Q. Okay. So you did not always follow that  
 12 requirement?  
 13 A. I did not, no.  
 14 Q. Now, you said that if an incident was not  
 15 classified as bullying, harassment, intimidation or  
 16 sexual harassment, it would still be reported on this  
 17 form?  
 18 A. So they would initially -- so let me just  
 19 summarize this real quick. So, you know, everybody -- the  
 20 word bullying is kind of represented and misused a lot,  
 21 so a lot of times people would just fill this form out  
 22 thinking it was a bullying situation, and that's what I

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11:14:24 1 A. Not specifically, no.  
 2 Q. Can you describe the trainings in which the  
 3 students were trained on the code of student conduct?  
 4 A. Yes. So once a quarter, the students were  
 5 trained on what we call the grade level assemblies, and  
 6 that's where we reviewed the code of conduct with the  
 7 students, collectively with their grades.  
 8 They also -- and don't quote me, but I  
 9 want to say the beginning of the school year for sure in  
 10 their English classes, they went through another training  
 11 with the pupil personnel worker and the guidance  
 12 counselor on the code of conduct, and that's when they  
 13 signed off on it also, stating that they understood the  
 14 code of conduct.  
 15 Q. Okay. So there were quarterly assemblies --  
 16 A. Yes.  
 17 Q. -- per grade level?  
 18 A. Yes.  
 19 Q. And there was once a year a training  
 20 conducted in the English classes by the pupil personnel  
 21 worker?  
 22 A. Correct.

11:15:24 1 Q. So let's start with the assemblies. Who was  
2 invited to the assemblies?

3 A. The grade levels. So if it was ninth grade,  
4 they would be ninth grade. So all students came, but  
5 they were based upon the grade level.

6 Q. So there were four?

7 A. There were four, yes.

8 Q. Is it your understanding that at these  
9 assemblies, the students would go over the whole code of  
10 student conduct?

11 A. Yes.

12 Q. And at the one-year English class training  
13 with the pupil personnel worker, is it your understanding  
14 that the students would go over the whole code of student  
15 conduct?

16 A. Yes, they would. That would have been more  
17 in-depth with the -- during the class time, it was more  
18 in-depth, yes.

19 Q. Can you describe how, at the assemblies, the  
20 students would go over the code of student conduct?

21 A. So the grade level administrator would  
22 review the code of conduct with the, specifically go over

11:17:33 1 dealt with issues outside of the Student Handbook, or  
2 just limited to what was in the Student Handbook?

3 A. To my knowledge, it was limited to the  
4 Student Handbook.

5 Q. So any discussion on acceptable or  
6 prohibited conduct was limited to what was defined in  
7 the student code of conduct?

8 A. That's correct. Unless a child may have  
9 asked a question and it was addressed that way.

10 Q. While you were an assistant principal at  
11 Friendly High School, did any of these assemblies or  
12 trainings include a component on issues relating to  
13 diversity and sensitivity?

14 A. No. Again, that was towards the students,  
15 correct? With the students?

16 Q. Yes, the student trainings.

17 A. Yes.

18 No, no.

19 Q. Therefore, none of the trainings would have  
20 included diversity or sensitivity with regard to  
21 transgender individuals; correct?

22 A. So may I ask a clarifying question?

11:18:36 1 each and every infraction. Not necessarily talking about  
2 what the consequence would be, but what's acceptable and  
3 what's not acceptable, essentially.

4 Q. And at the one-year English class training  
5 with the pupil personnel worker, can you describe how the  
6 students would go over the code of student conduct?

7 A. Somewhat similar to what we would do  
8 collectively with the grade level, but the pupil  
9 personnel worker or the guidance counselor would go a  
10 little more in-depth explaining the infractions, talk  
11 about the consequences.

12 Actually in some instances, we didn't do  
13 this every year, but I can say my first year, I believe,  
14 they also got a copy of the handbook.

15 Q. Was there a component in the assemblies that  
16 covered issues outside of what was in the Student  
17 Handbook, or was it just limited to what was in the  
18 Student Handbook?

19 A. It was limited to what was in the Student  
20 Handbook.

21 Q. Was there a component during the one-year  
22 English class training by the pupil personnel worker that

11:18:53 1 Q. Sure.

2 A. So I know for sure not mandated by Prince  
3 George's County, but I may be jumping the gun again, but  
4 I do know that Miss Eller did have a club.

5 Q. Mm-hmm.

6 A. I know that they reached out to kids and  
7 they kind of expressed it, and that was shared maybe  
8 during -- it wasn't a grade level assembly; it was just  
9 during an assembly, like a school-wide function. I know  
10 they shared a couple of things about diversity. So I  
11 don't know if that's inclusive of the training or being  
12 equitable, but I mean...

13 Q. Well, since you mentioned that, I'll talk a  
14 little bit about that now with you, and then we'll go  
15 back to this.

16 So is that club "Caring Colors"; is that  
17 the club?

18 A. Yes, yeah.

19 Q. That's a student organization?

20 A. Mm-hmm. Student initiative, initiated and  
21 student-led.

22 Q. So when you're discussing the students

11:16:49 1 scoring, you know, information with other students, it's  
 2 not administrators training students?  
 3 A. No.  
 4 Q. It's student-to-student interaction;  
 5 correct?  
 6 A. Absolutely, yes.  
 7 Q. So separate from the Caring Colors students  
 8 that would share information with other students, there  
 9 was no diversity or sensitivity training that included  
 10 transgender people?  
 11 A. No.  
 12 Q. You mentioned that there might have been an  
 13 event in which Caring Colors discussed issues of  
 14 transgender diversity with the student class?  
 15 A. Mm-hmm, yes.  
 16 Q. Can you describe that event?  
 17 A. So -- just trying to go back in my head. I  
 18 know we had thousands of events with the kids. I'm just  
 19 thinking of one student in particular that I know Miss  
 20 Elliot was very close to. Very close. He was also the  
 21 SGA president. So I think every opportunity he had to  
 22 talk about Caring Colors, he shared stuff about Caring

11:22:13 1 was -- that he was there. [REDACTED] is his name. I  
 2 remembered his name.  
 3 I want to say probably the 2012-2016  
 4 school year.  
 5 Q. Do you specifically remember the content  
 6 that they shared?  
 7 A. I do not.  
 8 Q. So you wouldn't know if it was just in  
 9 regard to sexual orientation or also included gender  
 10 identity and transgender status?  
 11 A. I mean, their aim was about equity among the  
 12 LGBTQ community, so everything they did focused around  
 13 that.  
 14 Q. Okay. And when [REDACTED] would speak to his  
 15 classmate, was it just his class or was it to the whole  
 16 school?  
 17 A. It was everybody.  
 18 Q. Everyone.  
 19 A. It was everybody.  
 20 Q. So now we're going to discuss a few  
 21 instances in which Miss Elliot alleged harassment.  
 22 A. Okay.

11:29:04 1 Colors. I can't think of anything in particular off the  
 2 top of my head, but I can see him always vocalizing.  
 3 Q. Good.  
 4 Do you have his name; do you remember  
 5 his name?  
 6 A. I want to give you two names. I may be  
 7 wrong.  
 8 Q. Sure.  
 9 A. It's either [REDACTED] or -- I'm going to say it  
 10 was [REDACTED].  
 11 Q. Last name. Do you have a last name?  
 12 A. Mm-hmm. (Witness shakes head back and  
 13 forth.)  
 14 Q. Can you think of any other events that -- in  
 15 which Caring Colors shared information with students?  
 16 A. I know they did like little public service  
 17 announcements over the morning announcements, afternoon  
 18 announcements. They had fliers up throughout the school,  
 19 just with facts and quotes and things.  
 20 Q. Do you remember which school years this  
 21 happened in?  
 22 A. Oh, definitely 2000 -- the two years I

11:32:44 1 Q. So we're switching subjects, and I just  
 2 wanted you to know that.  
 3 A. Okay.  
 4 Q. Do you recall Miss Elliot ever reporting that  
 5 she had been misgendered by another member of the  
 6 administration?  
 7 A. I did not hear Miss Elliot say that directly,  
 8 but it was rumored throughout the building.  
 9 Q. Do you recall an assistant principal et  
 10 Friendly by the name of Miss Robinson?  
 11 A. I do.  
 12 Q. Do you recall her being the administrator in  
 13 charge of the social studies department?  
 14 A. Yes.  
 15 Q. Do you recall her being transferred to the  
 16 administrator in charge of the English department?  
 17 A. I do.  
 18 Q. She replaced you as the English department  
 19 administrator, right?  
 20 A. That is correct.  
 21 Q. Do you recall the reason for the change in  
 22 placement?

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11:24:32 1 A. It was a disagreement between her and the  
2 social studies department, and her managing style versus  
3 their learning style is the best way I can describe that.  
4 Q. Could you be a bit more specific about what  
5 the disagreement was about?  
6 A. I mean, I was not privy to all of the  
7 information, and I didn't care at the time, truthfully.  
8 Q. Mm-hmm.  
9 A. But I just know her expectations and her  
10 managing style was not something that they were liking,  
11 is best way I can say it.  
12 Q. Was she too strict; was that the problem?  
13 A. No, she was consistent.  
14 Q. Okay. Do you recall her calling a white  
15 English teacher in the social studies department, a  
16 redneck?  
17 A. I do not.  
18 Q. Do you recall Miss Eller reporting that Miss  
19 Robinson had misgendered her?  
20 A. Repeat that again.  
21 Q. Do you recall Miss Eller reporting that Miss  
22 Robinson had misgendered her?

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11:25:01 1 A. No.  
2 Q. Do you recall ever being interviewed  
3 regarding this complaint?  
4 A. No.  
5 Q. Do you recall -- even if you don't recall  
6 the event itself, do you recall being present at that  
7 event?  
8 A. No.  
9 Q. So we're going to pass you a document Bates  
10 Numbered PAGE 8089, and we're going to mark it Exhibit  
11 39.  
12 (Plaintiff Exhibit 39, e-mail, meeting notes, 2.20.2015,  
13 Thompson/Adams, was marked for identification.)  
14 MR. SHARMA: Thank you.  
15 Q. Please review the document and let me know  
16 when you're done.  
17 A. Okay.  
18 Q. So this document is an e-mail sent by you to  
19 Mr. Adams and Miss Eller, with the subject, "Meeting  
20 notes": correct?  
21 A. Correct.  
22 Q. Do you recall the circumstances under which

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11:25:06 1 A. Not to me, but it was just, like I said, it  
2 was rumored throughout the building.  
3 Q. Do you know when you were first made aware  
4 of this incident or of the rumor?  
5 A. The specific date, no, but...  
6 Q. Okay. We're going to provide you with Miss  
7 Eller's complaint against Miss Robinson, which has  
8 previously been marked as Exhibit 23 --  
9 (Plaintiff's Exhibit 23, Discrimination or Harassment  
10 Incident Report, was presented.)  
11 MR. SHARMA: Thank you.  
12 Q. -- for you to review and let me know when  
13 you're ready.  
14 A. Okay.  
15 Q. Do you recall the February 13th, 2015,  
16 meeting that Miss Eller refers to in this complaint?  
17 A. I do not.  
18 Q. Do you recall ever receiving this complaint?  
19 A. No, I never received this complaint.  
20 Q. Do you recall anyone at Prince George's  
21 County Public Schools ever contacting you regarding this  
22 complaint?

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11:25:44 1 you drafted this e-mail?  
2 A. I do now; yes, sir.  
3 Q. Can you explain those circumstances?  
4 A. This was in reference to the conflict that  
5 Miss Eller -- this was actually -- let me say, this was  
6 my first time hearing about the instance. Mr. Adams had  
7 asked me to sit in on a meeting with he and Miss Eller  
8 and asked me to just take notes. And that's my first  
9 instance of hearing about this situation, yes. I do  
10 recall this, yes.  
11 Q. So this e-mail, would you agree, is the  
12 transcription of the notes that you took?  
13 A. That is correct, yes.  
14 Q. And you sent the transcribed notes to  
15 Mr. Eller -- I'm sorry, Miss Eller and Mr. Adams?  
16 A. That's correct.  
17 Q. And the date of this e-mail is February 20,  
18 2015; correct?  
19 A. That's correct, yes.  
20 Q. Do you recall if that is also the date the  
21 meeting was held?  
22 A. Yes, it was. I believe so, yes.

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11:30:38 1 Q. So I'm going to ask you to look at line 2.  
 2 There you write that Miss Eller stated that the previous  
 3 Friday, and on multiple occasions, Miss Robinson had  
 4 misgendered her; correct?  
 5 A. Line 2. Correct, yes.  
 6 Q. And on line 4, you write that Miss Eller  
 7 stated that Miss Robinson used male pronouns three times  
 8 and that a guest in the room began referring to Miss  
 9 Eller using male pronouns as well; correct?  
 10 A. Correct.  
 11 Q. Do you recall the identity of the guest in  
 12 the room?  
 13 A. I do not. And I'm assuming from my notes,  
 14 it may have been Miss Bobadilla.  
 15 (Clarification requested by the Court Reporter.)  
 16 A. B-O-B-A-D-I-L-L-A.  
 17 Q. Who was Miss Bobadilla?  
 18 A. Miss Bobadilla is a math teacher.  
 19 Q. On line 4, you write that Miss Eller stated  
 20 that Miss Robinson used male pronouns -- sorry, we just  
 21 did that.  
 22 Q. On line 6, that line is incomplete.

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11:32:41 1 Q. Did I read that correct-y?  
 2 A. Yes.  
 3 Q. So before February 13, 2015, you had  
 4 replaced Miss Robinson as Miss Eller's observer; correct?  
 5 A. That, I do not know. I do not recall.  
 6 Q. Do you recall replacing Miss Robinson as  
 7 Miss Eller's observer?  
 8 A. I do.  
 9 Q. Do you remember the nature of the incident  
 10 that resulted in you replacing Miss Robinson?  
 11 A. No.  
 12 I was not privy to that information and  
 13 didn't ask questions.  
 14 Q. Okay. How were you informed that you would  
 15 be replacing Miss Robinson?  
 16 A. It's -- to my knowledge -- again, I don't  
 17 remember everything. It's been a while ago. It's just  
 18 in the system, you can just be switched. So you can just  
 19 be changed as to who the observer is.  
 20 Q. Okay. Who would be the person that would  
 21 switch the observer?  
 22 A. It would come from the principal.

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11:31:50 1 Do you recall what the rest of the  
 2 sentence was?  
 3 A. I do not.  
 4 MR. SHARMA: Which one is line 6? I'm  
 5 confused as well.  
 6 MR. RODRIGUEZ: Sorry, yes.  
 7 A. Indicated that --  
 8 Q. "Indicated that Miss Robinson said that it  
 9 was a hard transition for her..."  
 10 Or actually, I'm not -- sorry. It's  
 11 "indicated that if it happens once or twice, lets it  
 12 slide, but when it occurs..."  
 13 A. Yeah.  
 14 Q. Now --  
 15 A. I do not know.  
 16 Q. Now, the line that starts with, "Mentioned  
 17 prior incident as to why Mr. Thompson." That continues  
 18 as, "was switched to her observer from Miss Robinson";  
 19 correct?  
 20 MR. SHARMA: Is that what it says; is  
 21 that the question?  
 22 MR. RODRIGUEZ: Yes.

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11:33:35 1 Q. So it would be Principal Adams in this case?  
 2 A. That's correct.  
 3 Q. I'm going to ask you to go down to the line  
 4 that starts with "one of the security officers."  
 5 A. Okay.  
 6 Q. The second sentence in that line states, "It  
 7 is a problem with people not using the proper pronouns";  
 8 correct?  
 9 A. That's correct.  
 10 Q. Before that moment, had you been aware that  
 11 Miss Eller considered that there was a problem with  
 12 people not using the proper pronouns?  
 13 A. No. I was not aware.  
 14 Q. And after that meeting, did you become aware  
 15 of other instances in which people referred to Miss Eller  
 16 using the wrong pronoun?  
 17 A. No.  
 18 Q. So you don't recall dealing with instances  
 19 in which Miss Eller reported a student used the wrong  
 20 pronoun?  
 21 MR. SHARMA: Objection. You can answer.  
 22 Q. After that meeting?

11:34:36 1 A. After this meeting specifically?  
 2 Q. Yes.  
 3 A. I can't recall. So I will say there were  
 4 instances, yes. I just can't specify the time frame.  
 5 Q. Okay.  
 6 A. I can say that.  
 7 Q. Now, the next line down which begins with,  
 8 "Would like a diversity training." In that line, Miss  
 9 Eller stated that she would like diversity training to  
 10 address the subject matter; correct?  
 11 A. I believe so, yes.  
 12 Q. Did you understand the subject matter to  
 13 mean diversity training with regard to transgender  
 14 individuals and gender identity?  
 15 A. I inferred that, yes.  
 16 Q. Before that moment, had you been aware of  
 17 any requests by Miss Eller for diversity training on  
 18 gender identity and transgender issues?  
 19 A. Not that I recall.  
 20 Q. Before that moment, had anyone approached  
 21 you to discuss diversity training on gender identity and  
 22 transgender issues?

11:36:28 1 A. Ammana, A-M-M-A-N-A, Simmons.  
 2 COURT REPORTER: Thank you.  
 3 Q. Okay. And he said this at this meeting?  
 4 A. Correct, yes.  
 5 Q. So then after this meeting, you never  
 6 discussed with Mr. Adams Miss Eller's request for  
 7 training again?  
 8 A. I did not.  
 9 Q. Did you have an opinion on Miss Eller's  
 10 request for training?  
 11 A. I did not.  
 12 Q. Do you know if Mr. Adams contacted  
 13 Mr. Fossett or labor relations about instituting the  
 14 training?  
 15 A. I do not.  
 16 Q. Did you contact Mr. Fossett or labor  
 17 relations about instituting the training?  
 18 A. I did not.  
 19 Q. Could you have done that as an assistant  
 20 principal?  
 21 A. Per the directive from my principal, yes.  
 22 Q. So Mr. Adams would have had to ask you first

11:35:28 1 A. No.  
 2 Q. Now, the next line down, you write that  
 3 Mr. Adams responded that he would need to speak to  
 4 Mr. Fossett and labor relations about instituting a  
 5 training; correct?  
 6 A. Correct.  
 7 Q. Now, after this meeting, did you stay in the  
 8 room with Mr. Adams?  
 9 A. I do not recall.  
 10 Q. Do you recall if you ever discussed with  
 11 Mr. Adams after this meeting the request for training?  
 12 A. I do. I do, as I kind of mentioned earlier  
 13 and alluded, I remember us discussing during this meeting  
 14 with Miss Eller that one of us would reach out; but  
 15 clearly it must have been Mr. Adams as his name is right  
 16 next to it.  
 17 And that's the last I do remember of  
 18 that. I remember specifically him mentioning a person's  
 19 name. I remember -- the only reason I remember is  
 20 because I dealt with her recently. Ammana Simmons. He  
 21 said he was going to reach out to her also.  
 22 (Clarification requested by the Court Reporter.)

11:37:29 1 to contact them?  
 2 A. That's correct.  
 3 Q. You couldn't have done it on your own?  
 4 A. No, I believe in following protocol.  
 5 Q. Did you ever hear anyone else or anything  
 6 else from Mr. Adams or anyone else about training  
 7 concerning gender identity or transgender issues after  
 8 this meeting?  
 9 A. The only thing that I do recall is Miss  
 10 Eller requesting if she could do the training.  
 11 Q. That was after this meeting?  
 12 A. It was either during this meeting or after  
 13 this meeting. I can't recall.  
 14 Q. Okay. Do you recall what the -- who she  
 15 expressed that desire to?  
 16 A. So if it was during this meeting, it had to  
 17 be to Mr. Adams.  
 18 Q. Mm-hmm.  
 19 A. And I would say that would probably be it.  
 20 Probably to Mr. Adams and myself during the time of the  
 21 meeting, yes.  
 22 Q. Do you recall the response you received?

11:38:10 1 A. I do not.  
 2 Q. So on the last paragraph, you write that  
 3 Miss Eller asks Mr. Adams for the person who would come  
 4 to do the training to first meet with her, and that  
 5 Mr. Adams agreed with Miss Eller; correct?  
 6 A. That's correct, yes.  
 7 Q. Do you recall if any person came to train  
 8 this school on this issue?  
 9 A. I cannot recall, no.  
 10 Q. Do you recall if Miss Robinson remained an  
 11 administrator in charge of the English department  
 12 throughout the rest of the 2014-2015 school year?  
 13 A. I believe she did.  
 14 Q. Would she stay as the administrator in charge  
 15 of the English department during the 2015-2016 school  
 16 year?  
 17 A. I do not recall. Miss Robinson left, so I  
 18 do not recall.  
 19 Q. Okay. So we're going to provide you with  
 20 two documents now; a document Bates Numbered PGCE 7040,  
 21 which we'll mark as Exhibit 40.  
 22 (Plaintiff Exhibit 40, e-mail, 3.16.2015, Sexual

11:42:04 1 first paragraph, Miss Eller complains that earlier that  
 2 day, three boys were outside her classroom; correct?  
 3 A. Yes.  
 4 Q. And one of the boys stuck his head in the  
 5 class and referred to Miss Eller as, quote, "he," and  
 6 quote, and a, quote, "man," and quote; and that, quote,  
 7 "he emphasized the word man," and quote; correct?  
 8 A. Correct.  
 9 Q. And in the last paragraph, she asks that she  
 10 be kept updated on how the student's behavior was dealt  
 11 with; correct?  
 12 A. That is correct.  
 13 Q. And now, Exhibit 41, in this chain, Miss  
 14 Eller asks you how you coded the harassment she received  
 15 on March 16; correct?  
 16 A. That is correct.  
 17 Q. Do you now recall what the term code means  
 18 or to code with respect to a violation of the student  
 19 code of conduct?  
 20 A. I do.  
 21 Q. What does that mean?  
 22 A. How it is basically defined according to the

11:49:05 1 Harassment by Students, Eller/Adams, was marked for  
 2 identification.)  
 3 Q. And a document Bates Numbered, PGCE 8735.  
 4 (Plaintiff Exhibit 41, e-mail, 3.20.2015, Regarding  
 5 Harassment on the 16 March, Eller/Thompson, was marked  
 6 for identification.)  
 7 Q. Which we'll mark as Exhibit 41.  
 8 And let me know when you've finished  
 9 reviewing that.  
 10 A. I'm ready.  
 11 Q. Now, Exhibit 40 is an e-mail sent from Miss  
 12 Eller to Mr. Adams and Miss Kimberley Cosby on March 16,  
 13 2015; correct?  
 14 A. That is correct.  
 15 Q. And the subject is sexual harassment by  
 16 students; correct?  
 17 A. Correct.  
 18 Q. And Exhibit 41 is an e-mail chain from March  
 19 20, 2015, between Miss Eller and you regarding the March  
 20 16th, 2015, incident; correct?  
 21 A. That is correct.  
 22 Q. So let's start with Exhibit 40. So in the

11:49:04 1 code of conduct.  
 2 Q. So essentially classifying.  
 3 A. Classifying, yes.  
 4 Q. And your reply is that this violation was  
 5 coded as disrespect and not sexual harassment as defined  
 6 by the handbook; correct?  
 7 A. That is correct.  
 8 Q. Now, earlier today, you mentioned that you  
 9 considered intentional misgendering to violate the code  
 10 of student conduct both as to sexual harassment and  
 11 harassment. So my question is, why was this not coded as  
 12 sexual harassment?  
 13 A. I do not recall the specifics of this  
 14 circumstance or this situation, but one thing I can tell  
 15 you is whenever these type of situations did occur, they  
 16 were thoroughly investigated.  
 17 So therefore probably based upon my  
 18 investigation of the situation, it warranted that either  
 19 the kids were talking to Miss Eller or not talking to  
 20 Miss Eller at the same time.  
 21 So a lot of the times what I do recall  
 22 about Miss Eller is there would be other students in the

11:44:02 1 classroom and they may have been shouting or screaming or  
2 talking to someone else, and that may have been confirmed  
3 by several other students or by whoever else may have  
4 witnessed this in the hallway. I can't recall the  
5 specific incidence and what it yielded from the  
6 investigation.

7 But clearly, it may have yielded that  
8 they were being disrespectful in Miss Eller's presence,  
9 but not necessarily speaking and referencing to Miss  
10 Eller.

11 Q. So if we go it back to Exhibit 41, I'm going  
12 to read the last sentence in the first paragraph.

13 Quote, "He started laughing and said to  
14 his friends, he a, racial slur, that man, he emphasized  
15 the word man, he looked just like a, racial slur," and  
16 quote. Correct?

17 A. Mm-hmm.

18 Q. Do you understand that --

19 MR. SHARMA: Well, well, let me just  
20 offer. I think we need to say the word and I think it's  
21 material. So I'll object to the extent that's not what  
22 the line says.

11:46:01 1 are to receive ISS for discipline," and quote; correct?

2 A. That is correct.

3 Q. That means that you imposed in-school  
4 suspension on them; correct?

5 A. That is correct.

6 Q. Would you have imposed in-school suspension  
7 after -- before investigating the complaint?

8 A. Absolutely not.

9 Q. So once you have imposed in-school  
10 suspension on students, that is a result of the  
11 investigation that you conducted; correct?

12 A. That's correct.

13 Q. Can you define the violation disrespect  
14 under the Student Handbook?

15 A. According to the Student Handbook?

16 Q. Yes.

17 A. Sure.

18 MR. SHARMA: Page 60.

19 A. The students rights --

20 (Clarification requested by the Court Reporter.)

21 A. The Prince George's County Public Schools  
22 code of conduct, Student Rights and Responsibilities

11:45:04 1 MR. RODRIGUEZ: Okay. I'll read it  
2 again.

3 Q. Quote, "He started laughing and said to his  
4 friends, he a nigger, that man, bracket, he emphasized  
5 the word man, and bracket, he looks just like a nigger,"  
6 end quote; correct?

7 A. That is correct.

8 Q. Did you understand that as referring to  
9 someone that wasn't Miss Eller?

10 A. I can't recall, so -- what I can say is as  
11 we talk about using the word nigger, usually kids don't  
12 use the word nigger towards somebody who's not in their  
13 case.

14 MR. SHARMA: I'll just add for the  
15 record an objection because Exhibit 40 is not addressed  
16 to Mr. Thompson. So to the extent that he understood  
17 anything at this juncture, there's no foundation that's  
18 been laid for that.

19 MR. RODRIGUEZ: Okay.

20 Q. So let's go back to Exhibit 41.

21 You say in Exhibit 41 that according --  
22 quote, "According to the Student Handbook, the students

11:47:26 1 Handbook defines disrespect as making inappropriate  
2 gestures symbols or comments or using profane or  
3 offensive language.

4 It also defines it as using verbal  
5 insults or put-downs or lying to, misleading or giving  
6 false information to school staff.

7 Or the refusal or willful failure to  
8 respond to carry out a reasonable request by authorized  
9 school personnel.

10 COURT REPORTER: Thank you.

11 Q. Would you have coded that behavior as  
12 disrespect if that statement was made to another student?

13 A. Yes.

14 Q. And if that statement had been made to Miss  
15 Eller, would you have coded it as harassment or sexual  
16 harassment?

17 A. No. I would have kept it as disrespect.

18 Q. So if the student had made that comment to  
19 the -- to Miss Eller, that would not have fallen under  
20 the sexual harassment or harassment provision in the  
21 Student Handbook?

22 MR. SHARMA: Objection. You can answer,

11:49:32 1 enough.

2 A. No.

3 Q. So earlier today, you stated that

4 intentional misgendering of a transgender teacher would

5 constitute sexual harassment under the Student Handbook.

6 Do you recall that?

7 A. I do.

8 Q. If this student had made this comment to the

9 teacher, being Miss Eller, would that not have been

10 intentional misgendering?

11 MR. SHARMA: Objection. You can answer.

12 A. So I would say I cannot necessarily answer

13 that because I was not there during the situation. I do

14 not recall the specifics of it; 3rd grade, if the intent

15 was directly to Miss Eller, they would have said it to

16 Miss Eller; but again, if I'm recalling the situation

17 correctly, as this was five years ago, I believe other

18 students were around and the students were addressing

19 other students.

20 Q. Right. But my question was, if this had

21 been addressed to Miss Eller -- let's move on.

22 Do you recall if after you coded this

11:52:19 1 Q. So Exhibit 42 is an e-mail chain in which

2 the first e-mail is a report from Miss Eller regarding a

3 student, quote, "wagging her crotch," end quote, at Miss

4 Eller and singing a song during which she called Miss

5 Eller a, quote, "He"; correct?

6 A. That is correct.

7 Q. And the last e-mail in this chain is from

8 Mr. Adams telling Miss Eller to see you regarding the

9 investigation; correct?

10 A. That is correct.

11 Q. And Exhibit 43 is an e-mail from Miss Eller

12 to you asking about how the issue was handled and what

13 steps were taken to prevent a recurrence; correct?

14 A. That's correct.

15 Q. And she also described the incident to you;

16 correct?

17 A. That's correct.

18 Q. And Exhibit 44 is your response to Miss

19 Eller; correct?

20 A. That is correct.

21 Q. So on the first paragraph you state that the

22 student admitted to singing the inappropriate song;

11:49:46 1 incident as disrespect, if you filled out a Bullying,

2 Harassment or Intimidation Reporting Form?

3 A. I did not.

4 Q. So we're going to provide you three

5 documents for you to review: A document Bates Numbered,

6 PGCBE 5707, which we will tag as Exhibit 42.

7 (Plaintiff Exhibit 42, e-mail, 6.23.2015, Harassment from

8 student in Hallway, Adams/Eller, was marked for

9 identification.)

10 Q. A document Bates Numbered PGCBE 8730, which

11 we will tag as Exhibit 43.

12 (Plaintiff Exhibit 43, e-mail, 6.23.2015, Harassment from

13 student in Hallway, Eller/Thompson, was marked for

14 identification.)

15 Q. And a document Bates Numbered PGCBE 5694,

16 which we will tag as Exhibit 44.

17 (Plaintiff Exhibit 44, e-mail, 6.23.2015, Harassment from

18 student in Hallway, Thompson/Eller, was marked for

19 identification.)

20 Q. Please review them and let me know when

21 you're done.

22 A. I'm done.

11:53:06 1 correct?

2 A. Yes.

3 Q. And then you state that the gesture that

4 seemed inappropriate wasn't actually inappropriate;

5 correct?

6 A. Can you restate that question?

7 Q. Yeah. And then in the last sentence of that

8 first paragraph, you explain that the gesture that seemed

9 inappropriate wasn't inappropriate. The student was just

10 attempting to grab an electronic device.

11 A. Yes, I wanted to give that clarity. Yes.

12 Q. And in the second paragraph, you state that,

13 "You informed the student that the behavior could be

14 classified as sexual harassment"; correct?

15 A. That is correct.

16 Q. And when you refer to classification, you're

17 referring to the classification based on the Student

18 Handbook?

19 A. Yes.

20 Q. And you were referring specifically to the

21 song; correct?

22 A. Yes.

11:59:54 1 Q. Why did you classify the song, singing the  
2 song, as sexual harassment?

3 A. I do not recall, but I'm sure it was  
4 inappropriate, explicit song at the time. I do not  
5 recall what it was.

6 Q. Do you recall if it was saying in a  
7 sing-along voice, the word He to Miss Eller?

8 A. I believe the student did admittedly state  
9 that, but not necessarily to the teacher. The student  
10 was just singing aloud in the hallway being  
11 inappropriate.

12 Q. Now, in the last sentence, of the second  
13 paragraph, you state, quote, "The student has admitted to  
14 the inappropriate behavior and will be making a formal  
15 apology both in person and in writing"; correct?

16 A. That is correct.

17 Q. If she had not been singing that song to  
18 Miss Eller, would you have asked her to make a formal  
19 apology both in person and in writing?

20 A. Absolutely.

21 Q. To who?

22 A. To the adults that were present.

11:56:38 1 A. That's correct, yes.

2 Q. And you previously stated that in the prior  
3 incident that we discussed, you might have classified it  
4 as disrespect because the student wasn't talking to Miss  
5 Eller, but might have been talking to other people;  
6 correct?

7 MR. SHARMA: Objection. You can answer.

8 A. Okay.

9 So I would say that's based upon the  
10 circumstance of the situation. So had Miss Eller  
11 addressed the student and the student continued and --  
12 continued to go about doing what she was doing  
13 inappropriately, that would have been classified as  
14 disrespect as well.

15 So because if it was addressed by the  
16 adult, and the child continued to perform, that would  
17 have been disrespect.

18 Q. Okay. So you're saying that whether Miss  
19 Eller addressed it or not would not have changed the  
20 classification that you would have given?

21 A. That's correct.

22 MR. SHARMA: Objection. You can answer.

11:55:07 1 Q. So even if this song had not been sung  
2 directly to Miss Eller, you still would have said that it  
3 could classify as sexual harassment?

4 A. Yes, because evidently, the lyrics were -- I  
5 can't recall it, but the lyrics must have been  
6 inappropriate and that child should not have been singing  
7 that song aloud.

8 Q. Okay. If she had sung the song to Miss  
9 Eller, would you have classified it as sexual harassment?

10 A. I would say yes. I would.

11 Q. Can you explain the difference between  
12 singing the song that contains the word He, and referring  
13 to someone using the incorrect pronoun, like in the prior  
14 incident?

15 A. So regardless, both are calling someone out  
16 of their name. Restate the question again.

17 Q. Sure.

18 So I'll start again.

19 You stated that in this instance, even  
20 if the student had been singing it not to Miss Eller, but  
21 generally, you would have classified it as sexual  
22 harassment; correct?

11:57:38 1 A. Okay. That's correct.

2 Q. So the classification was based specifically  
3 on the student's behavior?

4 A. So in this case, as I told you, I do not  
5 recall. It would have been probably based upon the  
6 lyrics and inappropriateness of the song that the child  
7 was singing.

8 Q. Do you recall if you completed a Bullying,  
9 Harassment or Intimidation Reporting Form for this  
10 incident?

11 A. I do not recall.

12 Q. Do you recall if, other than having the  
13 student issue an apology, the student was otherwise  
14 disciplined?

15 A. I do not recall.

16 Q. So we're going to provide you an e-mail  
17 chain from April 2016, and that's Bates Numbered PGCBE  
18 6129, and we'll mark it as Exhibit 45.

19 (Plaintiff Exhibit 45, e-mail chain, 4.12.2016, Students  
20 in Hallway, Thompson/Eller, was marked for  
21 identification.)

22 A. Okay.

11:58:40 1 Q. Please review it.

2 A. Okay.

3 Q. So the first e-mail in the chain is actually

4 on the second page. Did you review that?

5 A. I did, yes.

6 Q. Great. It's the report from Miss Eller

7 regarding a group of students outside her classroom:

8 correct?

9 A. That is correct.

10 Q. And according to Miss Eller, she addressed

11 the group; and while the students were leaving, a female

12 member of the group told the other students that they

13 should have, quote, "ignored him"; correct?

14 A. That's correct.

15 Q. Now, if you turn back to the first page, in

16 the middle of the first page, you respond to Miss Eller;

17 correct?

18 A. In the middle of the first page, yes.

19 Q. You state that Miss Eller told you that the

20 male students in the group were respectful, but that the

21 female student was the one who spoke disrespectfully to

22 her; correct?

12:02:29 1 A. The same punishment, but different amount of

2 time that was served in in-school suspension.

3 Q. Do you recall the amount of time that the

4 male students served?

5 A. I do not.

6 Q. Do you recall the amount of time that the

7 female student served?

8 A. I believe the female student may have gotten

9 three days.

10 Q. Where would this punishment be recorded?

11 A. It should have been recorded with the

12 in-school suspension monitor.

13 Q. Is the in-school suspension monitor a

14 person?

15 A. Yes.

16 Q. I'm going to ask you a bit more questions

17 about the in-school suspension monitors because this is a

18 new person.

19 A. Oh, okay.

20 Q. Who is the in-school suspension monitor?

21 A. Oh, I believe it was Miss Angela Collins.

22 Q. And is the in-school suspension monitor a

12:01:16 1 A. That's correct.

2 Q. And then you state that you told Miss Eller

3 that these students would be placed in in-school

4 suspension, and that you would address the female

5 student's behavior; correct?

6 A. That is correct.

7 Q. Now, did you understand the disrespectful

8 behavior from the female student to be the female student

9 saying, quote, "ignored him," in reference to Miss Eller?

10 A. I do, yes.

11 Q. So the punishment for the male students who

12 Miss Eller stated were respectful was the same punishment

13 that was given to the student who misgendered Miss Eller?

14 A. Rephrase the question, please.

15 Q. Yeah.

16 So the punishment for the male students

17 was in-school suspension; correct?

18 A. That's correct.

19 Q. And the punishment for the female student

20 was in-school suspension; correct?

21 A. Correct.

22 Q. And these were the same punishment?

12:03:18 1 position that that person -- the only position that that

2 person holds, or is it a teacher who also serves the role

3 as --

4 A. No, that's a sole role. Her sole title.

5 Her sole role.

6 Q. Do you recall if Friendly High School had an

7 in-school suspension monitor during the whole time you

8 were assistant principal there?

9 A. Yes.

10 Q. And what is the -- what are the duties of

11 the in-school suspension monitor?

12 A. To -- essentially in-school suspension is an

13 alternative to suspension because we want to keep the

14 kids educated as much as possible; but essentially, it's

15 like in-house detention throughout the school day where

16 their work comes to them and they just have it in --

17 they're just segregated from the general population for

18 the day.

19 Q. Got it. That's in-school suspension.

20 What are the duties of the monitor?

21 A. Just essentially to monitor the students

22 that are in there.

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12:04:12 1 Q. Okay. Now, in terms of a paper record,  
2 where would the in-school suspension or the length of  
3 in-school suspension be recorded?  
4 A. So if this was written up on a PS74 first,  
5 it would be documented on the PS74. If not, the  
6 in-school suspension monitor -- don't quote me -- had  
7 their own method of recording it.  
8 So it could have been a paper copy that  
9 they have a notebook that they have to turn in at the  
10 end -- I don't know her method during that time -- or she  
11 could have created a Google doc where she kind of  
12 recorded all of the information on the kids that were  
13 there.  
14 Q. So if this had not been recorded on a PS74  
15 at first, the procedure, the recording procedure would  
16 have been completely different than it -- if it had been  
17 reported on a PS74 first?  
18 A. That's correct, yes.  
19 Q. And was it the in-school suspension  
20 monitor's role to record it, or was that something she  
21 just did because she wanted to?  
22 A. It was -- it's kind of twofold. So we kind

12:06:14 1 Now, in the e-mail right above your  
2 response, Miss Eller asks you for information on how the  
3 female student was addressed and reprimanded; correct?  
4 A. We are looking at 45?  
5 Q. Yes.  
6 A. Yes.  
7 Q. And in your final e-mail, you respond that  
8 the student was placed in in-school suspension and her  
9 behavior was coded as disrespect, per the Student  
10 Handbook; correct?  
11 A. That is correct.  
12 Q. Now, earlier, you stated that you understood  
13 the disrespectful behavior to be the student referring to  
14 Miss Eller as, quote, "ignored him"; correct?  
15 A. That is correct.  
16 Q. So that's an instance of misgendering;  
17 correct?  
18 A. That is correct, but I also would like to  
19 state that when this came to me -- I do recall this  
20 situation specifically. When it was explained to me in  
21 person by Miss Eller, it was more so her being upset  
22 about the disrespect.

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12:05:13 1 of used that data so we could figure out who our frequent  
2 flyers were to go in-school, and then also just to kind  
3 of monitor it, rather, for purposes: Is this the right  
4 placement for this child, or is this the right  
5 consequence for this child.  
6 Q. And was it a requirement that the in-school  
7 monitor record the suspension?  
8 A. It was requirement for the in-school  
9 suspension monitor to document who was in there for  
10 attendance purposes.  
11 Q. Okay.  
12 And would that record have gone into the  
13 student's file?  
14 A. If it was on a PS74, yes, and it was  
15 documented that in-school was the actual consequence; but  
16 as for just an in-school suspension monitor, saying that  
17 this child is coming to serve it here, no.  
18 Q. No.  
19 Do you know where that information would  
20 have been archived?  
21 A. I do not.  
22 Q. Okay.

12:07:16 1 She never referenced the student calling  
2 her out of her name. It was all about the student is  
3 completely disrespectful to me.  
4 Q. Were you aware that the student had said,  
5 "ignored him," in reference to Miss Eller?  
6 A. I do not recall. That specific detail.  
7 Q. Do you recall if you read the first e-mail  
8 in this chain when you were investigating?  
9 A. Prior to investigating? This e-mail, I  
10 saw -- I remember the specific date this happened. Miss  
11 Eller had actually saw me talking to the student, so I  
12 did not read the e-mail chain until after I spoke to Miss  
13 Eller.  
14 Q. Did you read the e-mail chain before you  
15 gave the student in-school suspension?  
16 A. No. The student was assigned in-school  
17 suspension upon my conversation with Miss Eller and with  
18 the student at the same time.  
19 Q. If you had known that part of that  
20 disrespect included the word ignore "him," would you have  
21 classified this incident as sexual harassment?  
22 MR. SHARMA: Objection. You can answer.

12:06:32 1 A. At the time I don't -- I would say I don't  
2 know. I would have to go back and do a thorough  
3 investigation of the matter.

4 Q. Do you recall if you completed a Bullying,  
5 Harassment or Intimidation Reporting Form for this  
6 incident?

7 A. I do not.

8 Q. Do you recall if you asked Miss Eller to  
9 fill out a PS74 after she spoke with you?

10 A. I do not recall.

11 Q. Do you recall if you asked her to fill out  
12 any other form after she spoke with you?

13 A. I do not.

14 Q. We're going to provide you with another  
15 e-mail chain from May 2016. This one's Bates stamped  
16 FGCBE 4332, and we'll mark it as Exhibit 46. Please  
17 review it.  
18 (Plaintiff Exhibit 46, e-mail, Sub Report for Monday, 9  
19 May, Eller/Thompson, was marked for identification.)

20 A. Okay. I'm done.

21 Q. And in the first paragraph, the e-mail chain  
22 describes a report from Miss Eller to you regarding a

12:11:43 1 Q. Do you recall if you completed a Bullying,  
2 Harassment or Intimidation Reporting Form for this  
3 incident?

4 A. I did not. I can tell you I did not.

5 Q. Under the Student Handbook, what would the  
6 behavior described in paragraph -- the first long  
7 paragraph -- be classified as?

8 A. Reading the Student Handbook, you said?

9 Q. Sure.

10 A. Under harassment?

11 Q. I'm sorry?

12 A. I said what are we referencing again,  
13 harassment?

14 Q. I'm asking you what you would code it as.

15 A. Based upon --

16 MR. SHARMA: Objection. You can answer.

17 A. Okay.

18 Are we saying based upon this e-mail?

19 Q. Yes.

20 A. So just at first glance, and me speaking  
21 administratively, what I would focus on is what Miss  
22 Eller referred to in this e-mail as, I believe as she

12:10:52 1 group of students repeatedly calling her a, quote, "he";  
2 correct?

3 A. That is correct.

4 Q. And Miss Eller also states that the students  
5 sing to her a song that states, quote, "my ding-a-ling;  
6 won't you play with my ding-a-ling"; correct?

7 A. That is correct.

8 Q. In the second paragraph, Miss Eller also  
9 reports that a female student in another class referred  
10 to Miss Eller multiple times as a quote, "he"; correct?

11 A. Yes. That's correct.

12 Q. And in the last paragraph, Miss Eller states  
13 that, quote, "The constant misgendering by the students  
14 is a problem and I believe plays a factor in the  
15 disrespect," end quote; correct?

16 A. That is correct.

17 Q. Do you recall what happened after this  
18 e-mail?

19 A. I do not.

20 Q. Do you recall if you disciplined the  
21 students?

22 A. I do not.

12:12:46 1 quotes, I believe, or I quote, Miss Eller, I believe  
2 plays a factor in the disrespect, and because Miss Eller  
3 stated disrespect, that is probably what I would have  
4 focused on as it related to the consequence the students  
5 may have received.

6 Q. So because Miss Eller used the word  
7 disrespect, that would influence the classification of  
8 the violation?

9 A. Yes.

10 Q. So the violation was not based solely on the  
11 facts of the student's conduct, but also the  
12 interpretation that the teacher gave?

13 A. That's correct.

14 Q. If Miss Eller had said that this was sexual  
15 harassment, that would have influenced you to classify  
16 that as sexual harassment?

17 A. That is correct.

18 Q. Let's go back to Exhibit 45, then.

19 In the last e-mail on the first page,  
20 Miss Eller states, quote, "I understand that with the  
21 help of Mr. G., the students were identified, including  
22 the girl who spoke harassingly to me," end quote;

12:15:00 1 correct?

2 A. That is correct.

3 Q. And that did not influence you to classify

4 the violation as harassing?

5 A. No, because it wasn't addressed to me

6 initially. And - said, again, with this instance it was

7 based upon what Miss Eller told me in person. It focused

8 again on disrespectful behavior.

9 Q. And let's go back to Exhibit 41. In the

10 last e-mail, which is the first e-mail of the chain, Miss

11 Eller e-mailed you asking to see how you decided to code

12 the harassment from the 16th March, and quote: correct?

13 A. That is correct.

14 Q. And that did not influence you to classify

15 the violation as harassment or sexual harassment;

16 correct?

17 A. Absolutely not, because like I said, based

18 upon my research and investigating the circumstance, it

19 did not warrant it being sexual harassment.

20 Q. Do you recall what it was about your

21 research and investigation that --

22 A. No.

12:15:00 1 facts that occurred?

2 A. I'm not one to say anybody's exaggerated.

3 So when they come to me, I take every case seriously.

4 Every concern or problem that they pose to me, I take

5 seriously, so I don't ever think anybody exaggerates.

6 Q. Okay. We're going to provide you with two

7 documents related to an incident from May 13, 2016, a

8 document Bates Numbered PC0BE 4261, which we will mark as

9 Exhibit 47.

10 (Plaintiff Exhibit 47, e-mail, URGENT: Please send...,

11 5.13.2016, Eller/Thompson, was marked for

12 identification.)

13 Q. And a document Bates Numbered PC0BE 4258,

14 which we will mark as Exhibit 48. Once you get them,

15 please review them.

16 (Plaintiff Exhibit 48, e-mail, URGENT: Please send...,

17 5.13.2016, Eller/Thompson, was marked for

18 identification.)

19 Q. Actually, we're also going to give you a

20 document Bates Numbered ELLER 128 which will be marked as

21 Exhibit 49.

22 (Plaintiff Exhibit 49, Student Discipline Referral,

12:16:34 1 Q. -- did not?

2 A. I do not, but as I told you when we

3 referenced this the first time, that whenever I did

4 respond back and what they got -- kind of pride myself on

5 is I make sure I thoroughly investigate a situation; and

6 if I was to respond like this, I thoroughly investigated

7 the situation.

8 Q. So a teacher's interpretation of a student's

9 behavior didn't always influence you?

10 A. No. There's two sides to every story.

11 Q. When a teacher reports an instance of

12 student behavior, would you say that both sides to that

13 story has equal weight initially?

14 A. It depends on the circumstances of the

15 situation.

16 Q. Do you recall ever investigating a complaint

17 filed by Miss Eller in which, after investigation, you

18 determined that the facts as explained by Miss Eller were

19 not the facts that actually occurred?

20 A. I do not recall it specifically, no.

21 Q. Do you recall investigating a report -- any

22 report filed by Miss Eller in which she exaggerated the

12:16:44 1 5.13.2016, ELLER300128, was marked for identification.)

2 A. All right.

3 Q. So let's start with Exhibit 47. This is an

4 e-mail chain between you and Miss Eller, in which Miss

5 Eller reports that she's being referred to a quote,

6 "he/she," end quote, and that a student is trying to

7 enter the room; correct?

8 A. That is correct.

9 Q. And she also states that she doesn't know

10 the location of the call button; correct?

11 A. That is correct.

12 Q. What's a call button?

13 A. It is what you use to ring the office. The

14 PA system, essentially.

15 Q. Okay. Is it used for emergency purposes

16 only, or for any purpose?

17 A. It's used for multiple purposes.

18 Q. Okay. And you reply to Miss Eller that

19 you're on the way; correct?

20 A. That is correct.

21 Q. And in the following e-mail, you -- Miss

22 Eller, the following exhibit, sorry, Miss Eller states

12/21/11 1 that she had returned some semblance of order to the  
 2 class; correct?  
 3 A. Yes.  
 4 Q. And she also states that, in addition to  
 5 being referred to as a he/she by [REDACTED]  
 6 [REDACTED] had also referred to her as a "he" various  
 7 times; correct?  
 8 A. That is correct.  
 9 Q. After that e-mail, do you recall what  
 10 happened?  
 11 A. I do not. As I saw, I didn't respond, so I  
 12 don't remember.  
 13 Q. Do you recall if between the first e-mail  
 14 and the second e-mail you arrived at the class?  
 15 A. I must have. I'm sure I did arrive at the  
 16 class.  
 17 Q. Do you recall what you said to the class?  
 18 A. I do not.  
 19 Q. Okay. So if you could please turn to  
 20 exhibit 49. This is Miss Eller's W374 regarding that  
 21 incident; correct?  
 22 A. Yes.

12/24/11 1 can go up from a level 2 to a level 4.  
 2 Q. Now, for someone who is between grade 6 and  
 3 grade 12, the response level is either 3 or 4; correct?  
 4 A. Correct.  
 5 Q. Do you recall if you imposed discipline on  
 6 [REDACTED]?  
 7 A. I do not, but I'm sure I did.  
 8 Q. Do you recall what that discipline would  
 9 have been?  
 10 A. I do not recall what the discipline would  
 11 have been, but just based upon just thinking back, he  
 12 probably received a suspension.  
 13 Q. In-school or out of school?  
 14 A. Out of school. But don't quote me, as I  
 15 will say, I do not remember.  
 16 Q. Do you recall if you coded [REDACTED]  
 17 [REDACTED] behavior as sexual harassment or harassment?  
 18 A. I do not remember.  
 19 Q. Would [REDACTED] referring to Miss Eller as  
 20 a he/she and so a he multiple times classify as sexual  
 21 harassment under the Student Handbook?  
 22 A. Yes.

12/23/11 1 Q. I can represent to you that the student's  
 2 case that's blacked out is [REDACTED]  
 3 Now the fourth bullet in the section  
 4 titled, Describe Student's Conduct states, "Told others  
 5 he was about to knock me on my ass, in reference to me."  
 6 Correct?  
 7 A. That's correct.  
 8 Q. Would you agree that this is a threat of  
 9 physical assault?  
 10 A. I do, Yes.  
 11 Q. How would such a threat be coded under the  
 12 Student Handbook?  
 13 A. It would be threatening.  
 14 Q. Do you recall what the punishment is for a  
 15 threat of physical assault against a teacher under the  
 16 Student Handbook?  
 17 A. Oh, it has changed over the years, but I can  
 18 tell you as I referenced this during the time.  
 19 Q. Sure.  
 20 A. So according to the handbook, a threat is a  
 21 written or verbal threat to a student or a written or  
 22 verbal threat to a RCBP employee, and those intentions

12/28/11 1 Q. Could student conduct, a violation of the  
 2 code of student conduct, be coded under multiple things?  
 3 MR. SHARMA: Objection. You can answer.  
 4 A. I'm going to ask you to rephrase that so I  
 5 can answer it correct.  
 6 Q. Can a violation of the code of student  
 7 conduct by a student be coded as different types of  
 8 behavior?  
 9 A. It could be, yes.  
 10 Q. So specifically with this instance, it is  
 11 possible to code this as a threat and also sexual  
 12 harassment or harassment?  
 13 A. That is correct.  
 14 Q. Now, you testified earlier that at the time  
 15 Miss Eller requested diversity training in the meeting  
 16 with you and Mr. Adams regarding the incident with Miss  
 17 Robinson, that you did not have an opinion about her  
 18 request for training.  
 19 A. That's correct.  
 20 Q. After this incident, did you develop an  
 21 opinion about Miss Eller's request for diversity training  
 22 dealing with gender identity and transgender status?

12:27:44 1 A. This specific incident with the student?

2 Q. Yeah.

3 A. I do not recall if -- if I had any opinion

4 about it, or not.

5 Q. After the incidents that we just discussed,

6 do you recall if, after any of them, you developed an

7 opinion on Miss Eller's request for training on diversity

8 dealing with gender identity and transgender status?

9 A. If I recall, I -- I believe Miss Eller

10 offering again if she can have some type of meeting or

11 training with the staff. I don't know if it was after

12 this specific incident, but I know she did ask -- after

13 the meeting with Mr. Adams, she did ask again if she can

14 host it; and again, I referenced her to Mr. Adams.

15 Q. After that request, do you recall -- did you

16 develop an opinion about that specific request?

17 A. No, I was neutral.

18 (Clarification requested by the Court Reporter.)

19 THE WITNESS: I was neutral, yes.

20 Q. Over the period of time in which you were

21 assistant principal at Friendly High School, did you ever

22 reach out to a supervisor to seek advice on how to

01:02:24 1 correct?

2 A. Yes, that is correct.

3 Q. Who decided when to hold those assemblies?

4 A. As it pertains to the grade level

5 assemblies, that was decided upon by administration when

6 we would do that. The other assemblies were either

7 decided upon by the student government association or on

8 a case-by-case basis.

9 Q. So in terms of the grade level assemblies

10 first, you said that by the administration.

11 A. Yes.

12 Q. Could you be a bit more specific about who

13 in the administration you're referring to?

14 A. So the whole administrative team that

15 consists of the principal and the assistant principals.

16 We conducted those assemblies at the beginning of each

17 quarter.

18 Q. Right. And for the other assemblies that

19 were not the grade level assemblies, you said that the

20 student government association and who else?

21 A. Whoever else may have initiated. May have

22 been another organization or somebody that came in, too.

12:29:06 1 address harassment or sexual harassment?

2 A. No.

3 Q. Did you ever reach out to anyone from Prince

4 George's County Public Schools, outside of Friendly High

5 School, to seek advice on how to address harassment or

6 sexual harassment?

7 A. No.

8 Q. Did you ever recommend that training focused

9 on diversity with regard to gender identity and

10 transgender status be implemented?

11 A. No.

12 MR. RODRIGUEZ: I think we can take a

13 lunch break at this point.

14 THE WITNESS: Okay.

15 MR. RODRIGUEZ: If that works for you

16 guys.

17 THE WITNESS: Yes.

18 (RECESS, 12:29 p.m. - 1:02 p.m.)

19 BY MR. RODRIGUEZ:

20 Q. Mr. Thompson, earlier today, you stated that

21 separate from the grade level assemblies, there were many

22 assemblies that took place during the school year:

01:03:29 1 Q. And who would have to approve the request to

2 hold these assemblies?

3 A. That would be all administration for the

4 most part.

5 Q. Would that also mean the principal and the

6 assistant principal?

7 A. Yes, but ultimately the principal had the

8 say.

9 Q. So it wasn't like an even vote?

10 A. No.

11 Q. It was the principal decided at the end of

12 the day?

13 A. That's correct, yes.

14 Q. How was the schedule decided for these

15 assemblies?

16 A. The schedule for the grade level assemblies

17 was decided upon the end -- the start and the end of each

18 quarter; and the other assemblies, as I said, were based

19 upon something SGA may have put on the calendar, that

20 they wanted to do -- a special guest may have wanted to

21 come in and we just formulated that all on the school

22 calendar.

Q. Was it only SGA or could any organization request to hold an assembly?

A. Any organization could request.

Q. Could any student request, or did it have to be an organization?

A. It could be a student request, but it had to be well thought out, too.

Q. How about teachers?

A. Teachers also, yes.

Q. Can you describe some of the content of some of these other assemblies that weren't grade level assemblies, to the best your recollection?

A. Yes. We used to have a lot of -- and I'm just quoting out for, and you know what I'm saying, summarizing for the most part -- life lesson assemblies, so I would say just more so relative to the kids, things that they may face in life.

We had a lot of assemblies that dealt with life after school, after high school kind of assemblies.

We did not have too many assemblies that focused on -- I hate to say this, but academics. They

outside authorization?

A. That's correct.

Q. And if an outside speaker did not come in, if it was just the administration, for example, leading the assembly, the principal would not need to seek outside approval?

A. That's correct.

Q. And I'm just going to ask you a few questions to clear up the record about Carine Colors.

A. Okay.

Q. You mentioned that [REDACTED] talked to everyone about --

A. Yes.

Q. -- issues related to Carine Colors.

A. Yes.

Q. I just wanted to clear up whether when you meant everyone, you meant that Carine Colors led one of these assemblies or an event, or if Mr. Ellis just was very social and spoke to everyone about the issues?

A. The latter.

Q. The latter.

A. Very social. Yeah, very vocal, very social

were more so engaging things to kind of motivate the kids for the most part. That's what the majority of the assemblies were about. A lot of colour words based upon homecoming activities and just exciting events for the students.

Q. So these assemblies were -- dealt with issues outside of the curriculum, the content curriculum?

A. Correct, yes.

Q. Do you know if Principal Adams had to go outside of Friendly High School to obtain approval to authorize one of these assemblies?

A. I do not know. And I don't believe he did have to.

Q. At Wholson, do you have to seek outside approval to hold one of these assemblies or not?

A. It depends if it's an outsider that comes in. So some things have to be approved by legal first, but for the most part, no.

Q. So an outside speaker could come in to lead one of these assemblies?

A. Yes, correct.

Q. But in that case, the principal would seek

about it.

Q. Okay. Now, you conducted some observations on Miss Eller's teaching, correct?

A. That's correct.

Q. Do you recall when that began?

A. So we did both formal and informal observations. So I could say the start of the school year. So as early as September, I was in the classroom.

Q. September of 2014?

A. 2014, I would say, yes.

Q. Did you conduct both formal and informal observations of Miss Eller?

A. Yes.

Q. Did you conduct formal and informal observations of Miss Eller up until the time she left Friendly?

A. I believe so.

Q. Do you recall the outcomes of your observations of Miss Eller?

A. What do you mean by outcomes?

Q. Did you recall the score you gave her, or the -- no.

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01:08:02 1 A. I do not, no.

2 Q. Do you recall, separate from the specific

3 score, if they were positive results for her or not?

4 A. I'm just -- I'm sorry to be thinking, but

5 I'm thinking about our rubric that we go by, so I'm just

6 trying to use the verbiage correctly.

7 There were areas of growth. So I would

8 say there were strengths and weaknesses in each

9 observation, is the best way to say it.

10 Q. Can you identify some of the strengths and

11 weaknesses?

12 A. Off the top of my head, I cannot.

13 Q. Did you observe other teachers while you

14 were at Friendly?

15 A. Yes.

16 Q. Did they also have strengths and weaknesses?

17 A. Absolutely, yes.

18 Q. Do you remember that Miss Eller was removed

19 from teaching AP classes in June 2015?

20 A. I do.

21 Q. When did you first learn about the

22 possibility that Miss Eller might be removed from

143

01:10:17 1 When did you first learn of the decision?

2 A. I learned of the decision possibly in the

3 summertime, as the final call ultimately does come from

4 the principal; and I was not inclusive of that

5 conversation when they did the switches, I would say, to

6 the schedule.

7 So I remember in the summertime, I

8 learned about it. So if I had to say for me, probably

9 July.

10 Q. Okay. So when you say you weren't

11 inclusive, that means that you weren't part of the

12 decision-making team?

13 A. No. So there's a scheduling team.

14 Q. Okay.

15 A. So I was not part of the scheduling team.

16 So I just saw the aftereffects of the scheduling team's

17 results, and July is when I found out about it.

18 But we had conversations about just

19 reviewing data, figuring out is this the best teacher,

20 looking at the trend data, supposedly started around that

21 March/April-ish point, and then after that, the

22 scheduling team takes over.

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01:08:56 1 teaching AP classes?

2 A. To my recollection, I just remember the

3 decision was made after we looked at a -- we looked at

4 the trend data for that specific course, and then Miss

5 Eller, the decision was made based upon AP scores,

6 essentially.

7 Q. Do you remember when you first learned about

8 the possibility?

9 A. I do not. But I can say we usually start

10 talking about scheduling towards the end of the third

11 quarter, beginning of the fourth quarter, so probably

12 around that time frame. So that's probably -- I knew you

13 were going to ask me when.

14 That's probably March/April-ish, the

15 conversations are starting.

16 Q. Okay. So do you recall if during

17 March/April of 2015 that's when you first learned about

18 the possibility that Miss Eller would -- might be removed

19 or there was discussion?

20 A. No, I do not remember that specifically.

21 Q. You mentioned that you guys made a decision

22 or the administration made a decision at some point.

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01:11:14 1 Q. After the decision to remove -- to change a

2 teacher's schedule is made?

3 A. So, no. I -- that decision is -- so the

4 scheduling team and the principal ultimately make that

5 decision.

6 Q. Okay.

7 A. So if you're not inclusive of that, no.

8 Q. Got it.

9 A. That was not my forte at the time.

10 Q. Got it.

11 A. Okay.

12 Q. So just so that the record is clear, you

13 were part of initial discussions?

14 A. Initial discussions as it related to data

15 and teacher performance, yes.

16 Q. Right. And then the scheduling team and the

17 principal are the administrators that make the decision,

18 the final decision?

19 A. Principal makes the final decision.

20 Q. Okay. Then after that comes the scheduling

21 team?

22 A. No.

Q. The involvement of the scheduling team?

A. So recommendations are given. The principal is the one who makes the decision.

Q. Okay. And who --

A. The principal gives directly to the scheduling team.

Q. Who makes these recommendations?

A. So the recommendations come from -- I think -- the administrators. It comes from possibly the data coach. It comes from possibly the counselor. Sometimes principals. And I don't know if we did it during this time, but we usually have student surveys. It comes from student surveys. So it's a whole slew of data that we kind of go by before that decision is made.

Q. Who is the scheduling team?

A. It's whoever the principal wants it to consist of. It's usually the data coach. It's usually a couple of teachers. It's usually a guidance counselor or counselors. Administrators that the principal wants the administrators to be part of the team.

When I say administrators, that's assistant principals. Essentially, whoever else may want

Q. So you do not recall meeting with Mr. Adams and Miss Eller to discuss the decision to remove Miss Eller from AP classes?

A. I do not. The only -- the only meeting I remember is the one where I took those notes.

Q. Okay. Do you recall the rationale for removing Miss Eller from AP classes?

A. I do not. I do not.

Q. When are AP exams administered?

A. I have been removed from High School for two years. I should know this answer, right. They're usually in the springtime. I can't give you the specific data, but I believe it's in the spring. It's actually --

no.

Just go with spring. Just go with spring because it depends on the content. So they're tested on different times, so.

Q. So but third quarter, fourth quarter?

A. Bless you for third quarter. That's springish, so okay.

Q. Do you know when the scores are released?

A. Scores are released -- because I never had

the experience. The principal may send a call to say, hey, if you want to be part of this, this is an opportunity for you, so, essentially...

And I'm sorry. The master scheduler also is part of the scheduling team. That's the key person.

Q. Who is the -- do you recall who the master scheduler was?

A. You ready? Miss Mariano-Dolesh.

You ready? M-A-R-I-A-N-O, hyphen D-O-L-E-S-H. I believe she was the master scheduler during that time period, yes.

Q. Do you recall if some of the observations that you conducted on Miss Eller were -- took place before the decision was made to remove her from AP classes?

A. I do not recall. Because observations can go all the way until the end of May, so I do not recall.

Q. Do you recall who told you that Miss Eller was being removed from teaching AP classes?

A. I wasn't told. I necessarily looked at a child's schedule and that's how I found out.

12th grade, I didn't really focus on AP scores or 11th grade. But I know for the fact that the scores are usually released -- I just remember summertime is when all of us looked at the data, so I can't tell you when the scores were released.

Q. Are you aware that Miss Eller filed a discrimination charge with the EEOC about the conditions at Friendly High School?

A. No.

Q. Were you ever instructed by any administrator or Prince George's County Public Schools at any point in time you were at Friendly, to change the way you maintained records regarding Miss Eller?

A. No. No.

Q. Do you recall a transgender student at Friendly High School named [REDACTED]?

A. I do. I do.

Q. Can you tell us a bit about him?

MR. SHARMA: Objection. What are you specifically looking for?

BY MR. RODRIGUEZ:

Q. Do you recall if he faced any incidents of

1 transphobia?

2 A. None that I could specifically recall.

3 Q. Do you recall an incident between Miss Eller

4 and another teacher, Miss Clagett, concerning

5 Ms. Clagett's use of pronouns for [REDACTED]?

6 A. Could you be a little bit more descriptive

7 with that question?

8 Q. Sure.

9 A. I get what you're saying, but I just want

10 to --

11 Q. Sure,

12 Do you recall an incident in which Miss

13 Eller spoke with Ms. Clagett about Ms. Clagett using

14 incorrect pronouns when referring to [REDACTED]?

15 A. I remember a situation. I don't know if it

16 was necessarily with Miss Eller. I remember Ms. Clagett

17 coming to me and letting me know that the student, [REDACTED]

18 was transitioning. You know, you believe one day as such

19 and such and you come back one day as -- and you

20 transition.

21 I think [REDACTED] had corrected her, and I

22 think Ms. Clagett was just very transparent, saying, hey,

1 Q. Did your unfamiliarity influence your

2 response to Ms. Clagett?

3 A. No. My influence -- my influence was

4 not -- I mean, my response was not influenced by

5 anything. My response was influenced by literally my

6 pure ignorance of not knowing how to address the

7 situation.

8 Q. Did you tell Ms. Clagett that she could

9 refer to [REDACTED] using her -- the pronoun her, or a

10 female name?

11 A. I do not recall. What I do recall the

12 situation is Ms. Clagett asked me what do I call her. I

13 said when you call attendance, because legally her name

14 was still her female name, we had to call attendance by

15 what was in the female, which was her legal name which

16 was on the attendance. I do remember that conversation.

17 Q. Okay. Do you remember discussing with

18 Ms. Clagett what Ms. Clagett should call [REDACTED]

19 other than attendance situations?

20 A. No.

21 Q. Do you recall if Ms. Clagett ever received a

22 letter of course? for using incorrect pronouns when

1 this was hard for me, because this is how I first know

2 you. That's the only conversation I do remember about

3 that. I don't know if Miss Eller had a conversation with

4 Ms. Clagett regarding that.

5 Q. Do you remember what you told Ms. Clagett

6 when she came to you and told you this?

7 A. I believe my comment, my concern was we have

8 to respect who the child wants her to call, and during

9 that time, I was also unfamiliar with how we should

10 address the situation.

11 I remember telling Ms. Clagett just be

12 respectful of the situation. Your beliefs are your

13 beliefs, but we still have to be respectful of the child.

14 I do remember that specifically.

15 Q. So you said you were unfamiliar with the

16 situation, the situation being transgender identity?

17 A. I was unfamiliar with the situation being

18 transgender?

19 Q. I'm asking. Is that what you were referring

20 to when you said you were unfamiliar with the situation?

21 A. Of -- yeah, how to approach the situation

22 with the child, yes. With the student, rather.

1 referring to [REDACTED]

2 A. I do not know.

3 (Clarification requested by the Court Reporter.)

4 A. On that know, E-M-D-W. I'm not aware, yes.

5 Q. Do you recall attending a meeting with

6 Mr. Adams, Miss Eller, and Ms. Pope-Brown involving Ms.

7 Clagett referring to [REDACTED] using the word "her"

8 or calling [REDACTED] by his birth name?

9 A. I do not.

10 Q. Do you recall if [REDACTED] was a ninth

11 grade student?

12 A. [REDACTED] yes, was a ninth grade

13 student.

14 Can I rephrase this?

15 I don't remember if [REDACTED] had his

16 transition during ninth grade or tenth grade, but was

17 that a student in the building during the ninth grade

18 year? Absolutely.

19 Q. Thank you for that.

20 Just one final series of questions for

21 now.

22 You mentioned earlier that you had not

01:23:03 1 spoken with anyone else about this case, or depositions  
 2 in this case; correct?  
 3 A. That's correct.  
 4 Q. Is it possible that you spoke with Ms.  
 5 Pope-Brown about depositions in this case?  
 6 A. I -- so we spoke about where to come for the  
 7 location and what to -- basically how long it was going  
 8 to take. We didn't talk about the case in particular. I  
 9 just said, hey, did you go, where is it. She said by our  
 10 favorite brunch place, Farmers & Distillers, and that was  
 11 about it.  
 12 Q. Did you contact anyone else other than  
 13 Ms. Pope-Brown about the location --  
 14 A. No, absolutely not.  
 15 Q. -- or anything else regarding the case?  
 16 A. We can talk about the guy who served me.  
 17 That was about it. Just confirmed it with him.  
 18 Q. Okay.  
 19 MR. RODRIGUEZ: I think those are all of  
 20 the questions for now.  
 21 THE WITNESS: Okay.  
 22 MR. RODRIGUEZ: Thank you.

01:24:40 1 body?  
 2 A. It was about 96 percent African-American,  
 3 and about probably 4 percent Hispanic.  
 4 Q. Would you characterize the student body as  
 5 being inclusive?  
 6 A. Absolutely.  
 7 Q. What about the staff; what was the  
 8 demographic race on the staff, if you know off the top?  
 9 A. We had a diverse staff. So it ranged all  
 10 ethnicities, all nationalities were there.  
 11 Q. Was the staff equally as inclusive of one  
 12 another?  
 13 A. Yes. Definitely a family.  
 14 Q. We've heard that before in other  
 15 depositions. Everybody got along with each other. Nice  
 16 place to work.  
 17 A. Mm-hmm.  
 18 Q. Occasional socializing outside of work.  
 19 A. Mm-hmm.  
 20 Q. These are all yeses?  
 21 A. These are yeses. Yes, I apologize. Yes,  
 22 yes, and yes.

01:24:01 1 THE WITNESS: Thank you guys.  
 2 MR. SHARMA: Mr. Thompson, I have a few  
 3 questions. I'll try to be quick.  
 4 EXAMINATION  
 5 BY MR. SHARMA:  
 6 Q. You were at Friendly High School from 2014  
 7 to 2018; is that correct?  
 8 A. That is correct.  
 9 Q. About four years?  
 10 A. Four years, yes.  
 11 Q. What were your impressions of Friendly High  
 12 School?  
 13 A. It's one of the best schools in all of  
 14 Prince George's County.  
 15 Q. Why do you say that?  
 16 A. Not only because I graduated from there. I  
 17 just think the school is an ideal high school for a child  
 18 to attend. I think it's a great place that encompasses  
 19 learning and the whole child.  
 20 Q. Was the student body diverse?  
 21 A. It was not a diverse population.  
 22 Q. What were the demographics of the student

01:25:32 1 Q. Miss Eller taught ninth grade English?  
 2 A. I do not recall. I know AP courses were the  
 3 11th and 12th graders. I don't believe Miss Eller had  
 4 any ninth grade.  
 5 Q. Okay. You were her grade level  
 6 administrator, though; right?  
 7 A. I was ninth grade grade level administrator.  
 8 Content administrator.  
 9 Q. You mentioned earlier you had the  
 10 opportunity to observe both formally and informally Miss  
 11 Eller's performance?  
 12 A. That's correct.  
 13 Q. What were your impressions of Miss Eller as  
 14 a teacher?  
 15 A. Miss Eller was good at her content. But as  
 16 I said, to just great areas of strength and engaging the  
 17 kids, but also areas of growth.  
 18 Q. Was the areas of growth more of management  
 19 of the classroom or substance of the actual curriculum?  
 20 A. I would say substance and rigor of the  
 21 curriculum.  
 22 (Clarification requested by the Court Reporter.)

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01:28:36 1 THE WITNESS: Rigor of the curriculum.  
 2 Q. What did Miss Eller's students think of her  
 3 in general?  
 4 MR. RODRIGUEZ: Objection.  
 5 MR. MOGUL: If you know.  
 6 A. I mean for the most part, good rapport, good  
 7 relationship. They liked Miss Eller.  
 8 Q. And again, we have heard that before as  
 9 well, that she was -- I think the term that we've heard  
 10 before is beloved by her students?  
 11 A. Mm-hmm.  
 12 Q. You would agree with that?  
 13 A. I would. I definitely would, yes. I  
 14 apologize for nodding.  
 15 Q. Let's transition to PS74s.  
 16 A. Okay.  
 17 Q. These are the student discipline referral  
 18 forms; is that what they're called?  
 19 A. Yes.  
 20 Q. Okay. And these are completed by staff  
 21 members who want to impose some type of discipline on a  
 22 student for his or her behavior?

159

01:28:11 1 Q. Is that correct?  
 2 A. That is correct.  
 3 Q. And as to the PS74 reports that you yourself  
 4 investigated and handled and completed, you testified  
 5 earlier, did you not, that you either physically gave it  
 6 back to her or left it in her mailbox?  
 7 A. Yes. That's correct.  
 8 Q. Were there other administrators that would  
 9 have completed PS74 reports or investigated them for Miss  
 10 Eller?  
 11 A. If Miss Eller gave them to those  
 12 administrators, yes.  
 13 Q. Do you know who Miss Eller typically gave  
 14 those PS74 reports to?  
 15 A. It should have been to whoever the grade the  
 16 child was in. So if it was the ninth grade, the person  
 17 would have come to me. If it was tenth grade, it would  
 18 have gone to the tenth grade administrator, and so forth.  
 19 Q. Would Mr. Adams, if he would have received  
 20 those, would he delegate it according to that method?  
 21 A. Yes.  
 22 Q. Now we also mentioned the bullying,

158

01:27:24 1 A. That's correct.  
 2 Q. So it's incumbent upon the staff member to  
 3 initiate the process and complete the form?  
 4 A. That's correct.  
 5 Q. And to submit the form to an administrator?  
 6 A. That's correct.  
 7 Q. So if a staff member such as Miss Eller  
 8 fails to complete the form, there may be no record -- or  
 9 there may be no PS74 for that incident; is that correct?  
 10 A. That is correct.  
 11 Q. And if a form is completed, let's say by  
 12 Miss Eller, there should be a record of that form  
 13 somewhere; correct?  
 14 A. That's correct.  
 15 Q. And in fact, I think you said earlier, a  
 16 copy of the completed form is given back to the teacher,  
 17 is it not?  
 18 A. That's correct.  
 19 Q. So ideally, if Miss Eller completed a PS74  
 20 for each and every incident she reported, she should have  
 21 a copy of the completed form.  
 22 MR. RODRIGUEZ: Objection.

160

01:28:04 1 harassment or intimidation form; correct?  
 2 A. Yes.  
 3 Q. Okay. Is it your understanding that if a  
 4 staff member's complaint involves bullying, harassment or  
 5 intimidation, and that the staff member is seeking  
 6 discipline, that they're required to complete both of  
 7 those forms, the PS74 and the bullying form?  
 8 A. That's correct, that's correct.  
 9 Q. Was that done in practice or was it kind of  
 10 loosey-goosey at the school level?  
 11 A. It was loosey-goosey.  
 12 MR. SHARMA: That's my word.  
 13 Q. Now, if you could look at Exhibit 52, which  
 14 is the administrative procedure, this 4170 discrimination  
 15 and harassment?  
 16 A. Okay.  
 17 Q. All right. You were asked some questions  
 18 earlier as to whether you received any training on the  
 19 application of this policy?  
 20 A. Yes.  
 21 Q. And my understanding -- and you can correct  
 22 me if I'm wrong -- is that this policy and the form

01:00:13 1 that's attached to this policy is supposed to be filled  
 2 out by a staff member in the event of a discrimination or  
 3 harassment?  
 4 A. That's correct.  
 5 Q. And it's submitted to someone by the name of  
 6 Ammana Simmons. I'm looking at page --  
 7 A. She is --  
 8 Q. Yeah. 69C, right?  
 9 A. That's correct, yes.  
 10 Q. And Miss Simmons is an EEO adviser?  
 11 A. Yes.  
 12 Q. Am I correct to understand that once the  
 13 form is completed, it's sent by an administrator to Miss  
 14 Simmons in some form or another?  
 15 A. Yes, it can be either by the administrator  
 16 or it can be sent by the actual person making the  
 17 complaint.  
 18 Q. Am I also correct in understanding that the  
 19 complaint in and of itself is investigated by Miss  
 20 Simmons or someone from her office?  
 21 A. That's correct.  
 22 Q. So the investigation is done by someone

01:01:48 1 incident itself was the initial that I had -- initial  
 2 meeting that I had with her and Mr. Adams during that  
 3 time.  
 4 Q. And then the initial meeting, was that on  
 5 February 20, 2015? I'm looking at Exhibit Number 39.  
 6 A. Yes. That is correct.  
 7 Q. So the -- so the meeting with Mr. Adams and  
 8 Miss Eller took place on the same date that Miss Eller  
 9 signed the discrimination and her harassment incident  
 10 report: does that appear to be the case?  
 11 A. Yes, it does.  
 12 Q. Do you know which happened first?  
 13 A. I do not know what happened first.  
 14 Q. Did the discrimination or harassment  
 15 incident report, was that mentioned by Miss Eller in the  
 16 meeting with Mr. Adams?  
 17 MR. RODRIGUEZ: Objection.  
 18 A. Yes, it was. As I look at my notes, it  
 19 says, e-mail Miss Crosby and ask for suggestions. She  
 20 said that I wanted to talk today after school to fill out  
 21 a 4170 form.  
 22 Q. To your knowledge, did Miss Eller file such

01:30:54 1 outside of the school; correct?  
 2 A. That is correct, yes.  
 3 Q. And is it your understanding that at some  
 4 point, a written response or a findings of fact is issued  
 5 by Miss Simmons or her office?  
 6 A. Yes.  
 7 Q. Do you know if that happened here with  
 8 respect to Miss Eller's complaint of February 13, 2015,  
 9 Exhibit 23?  
 10 MR. RODRIGUEZ: Objection.  
 11 A. I do not, as that should have gone to the  
 12 principal.  
 13 (Clarification requested by the Court Reporter.)  
 14 Q. Were you -- and I'm focused on Exhibit 23  
 15 now. Right here.  
 16 Were you aware that Miss Eller submitted  
 17 this discrimination or harassment incident report on  
 18 February 20, 2015?  
 19 A. I was not aware of this.  
 20 Q. Did there come a point in time when you did  
 21 become aware that she submitted this report?  
 22 A. No. The only recollection I have of this

01:32:54 1 a report of discrimination or harassment prior to  
 2 February 20, 2015?  
 3 A. To my knowledge, no.  
 4 Q. Okay. And to your knowledge, did Miss Eller  
 5 file any other discrimination or harassment incident  
 6 report after this one, Exhibit 23?  
 7 A. Not to my knowledge, no.  
 8 Q. Okay. I think you said earlier you're not  
 9 aware -- you don't know if the report was investigated by  
 10 Miss Simmons, do you?  
 11 A. I do not know that.  
 12 Q. Because that would have gone to Mr. Adams?  
 13 A. Adams, correct.  
 14 Q. Now looking at Exhibit 35, who else was in  
 15 the meeting with you and Mr. Adams and Miss Eller?  
 16 A. I believe it was just us three.  
 17 Q. Was Miss Robinson in the meeting?  
 18 A. She was not. I do not recall.  
 19 Q. Do you know if Mr. Adams met with Miss  
 20 Robinson separately?  
 21 A. I believe he did, yes.  
 22 Q. Were you asked to take notes in that

165

01:33:56 1 meeting?

2 A. No.

3 Q. Do you know why?

4 A. I wasn't asked.

5 Q. Do you know if that meeting took place after

6 your meeting with Miss Eller or before?

7 A. I do not know.

8 Q. Do you know, is this the first time you've

9 had to take notes in a meeting such as this with

10 Mr. Adams?

11 A. This was my -- yeah, my very first instance

12 of taking notes and having to do -- be part of a

13 situation such as this.

14 Q. Do you have any idea why he asked you to

15 take notes of a meeting that he was having with a staff

16 member?

17 A. I do not know. He did not specify.

18 Q. Did he tell you afterwards?

19 A. He did, yes.

20 Q. What did he tell you?

21 A. He told me he wanted to make sure that he

22 had somebody in there to hear what was being stated and

167

01:35:29 1 Q. Where did it take place?

2 A. It took place in Mr. Adams' office.

3 Q. You mentioned Caring Colors?

4 A. Yes.

5 Q. What is Caring Colors?

6 A. I believe it was -- it was a club that was

7 inclusive of everything, but it focused mainly on the

8 LGBTQ [sic] community.

9 Q. Who ran this club?

10 A. It was student initiated and it was

11 sponsored by Miss Eller.

12 Q. How often did the club meet?

13 A. I do not know. I want to say weekly.

14 Q. Where did it meet?

15 A. In Miss Eller's classroom.

16 Q. After school?

17 A. After school, yes.

18 Q. How long did the club meet?

19 A. Actually after school and before school

20 sometimes.

21 Q. Oh, really?

22 A. Yes.

166

01:34:33 1 also to record accurately what was being stated.

2 Q. Did you think that was unusual?

3 A. I did not think that was unusual, no.

4 Q. And who is Eckton?

5 A. Eckton is a math teacher at Friendly High

6 School.

7 Q. Okay. And who is Miss Crosby?

8 A. I believe Miss Crosby was the PGCA union

9 rep.

10 Q. Was she in the meeting?

11 A. She was not in the meeting.

12 Q. Did they dial her in in the meeting at any

13 point?

14 A. No. To my recollection, no.

15 Q. Do you know if Miss Eller asked for a union

16 representation during this meeting?

17 A. I do not know.

18 Q. And how long did the meeting approximately

19 last?

20 A. Maybe about 15, 20 minutes.

21 Q. Okay. Was it in person?

22 A. It was in person, yes.

168

01:38:03 1 Q. How long did the club meet after school,

2 once a week?

3 A. I have no idea.

4 Q. You never sat in or observed?

5 A. I did not. I did not, no.

6 Q. And how do these clubs come to exist? Do

7 you have to ask for permission or is it at the school

8 level, at the County level? How does that work?

9 A. The club comes into fruition essentially for

10 this instance, the kids initiated it; and once they

11 initiate it, a policy is they have to find a sponsor.

12 Q. Is this -- does this require the approval of

13 the principal?

14 A. Yes. It requires the approval of the

15 principal.

16 Q. Are there any type of budgetary constraints

17 or concerns or issues that are impacted by after-school

18 activities such as this?

19 A. No, no.

20 Q. Do you know if Caring Colors ever asked the

21 school for any type of resource, flyers, paper?

22 A. I do not know.

169

01:38:58 1 Q. Who would be the best person to ask about  
2 Caring Colors?  
3 A. That would be the administrator over clubs  
4 and organizations during that time.  
5 Q. Who, do you recall who that was?  
6 A. I do not recall. It wasn't me.  
7 Q. And when you came onboard in 2014, was this  
8 club already in existence at the time?  
9 A. I do not know. I do not know.  
10 Q. Was Miss Eller the sponsor of the club, when  
11 you first became aware of the club?  
12 A. That's the only person I know that was the  
13 sponsor of the club, yes.  
14 Q. Do you have any ideas as to how large the  
15 club was in terms of enrollment or the like?  
16 A. I would say it probably had an average of  
17 10, 15 students.  
18 Q. Do you know if the club ever did any type of  
19 field trips or out-of-school activities?  
20 A. To my knowledge, no.  
21 Q. You don't know or they didn't?  
22 A. I don't know.

171

01:38:58 1 Q. Is there a requirement County-Wide for that,  
2 or that just varies on the administrators?  
3 A. It varies on the administrator.  
4 Q. Okay. Do you know how other administrators  
5 at Friendly operated?  
6 MR. RODRIGUEZ: Objection.  
7 A. It depends upon their availability during  
8 the time and how far of an investigation the infraction  
9 may have warranted.  
10 Q. Okay. So sometimes an investigation may  
11 have lasted a bit longer?  
12 A. Yes.  
13 Q. And therefore the discipline, if any, would  
14 have been a later date in time?  
15 MR. RODRIGUEZ: Objection.  
16 A. Yes.  
17 Q. Do you know how Ms. Pope-Brown operated,  
18 just from your dealings with her?  
19 A. Yeah, I learned a lot from Ms. Pope-Brown,  
20 so I could say yes. Yes.  
21 Q. Was she in the same ballpark in terms of  
22 response time?

170

01:37:43 1 Q. We went through a lot of e-mails today. The  
2 one thing I noticed was that the response from  
3 administration was usually pretty quick. Would you agree  
4 with that?  
5 A. Very much so.  
6 Q. Do Miss Eller's concerns?  
7 A. Very much so.  
8 Q. Was that typical or atypical?  
9 A. For myself that's typical because I always  
10 want to make sure everybody's voice is heard and let them  
11 know that they're respected.  
12 Q. So I'm looking at, for example, Exhibits 42,  
13 43, and 44, which were offered together. And it looks  
14 like Ms. Eller's e-mail was originally dated on June 22nd  
15 and by June 23rd, the very next day, a punishment was  
16 imposed on the students?  
17 A. That's correct.  
18 Q. So is that one-day turnaround typical of  
19 your handling of those types of situations?  
20 A. Absolutely. One day is actually slow. So  
21 usually it's the same day they get their infraction  
22 imposed.

172

01:38:37 1 A. I would say yes.  
2 Q. What about Mr. Adams as the principal?  
3 A. His plate was a little bit more full so I  
4 can't tell you yes or no for him, which is why he  
5 delegated a lot to make sure we followed up.  
6 Q. Was there any administrator that you believe  
7 didn't follow up on these types of concerns or issues  
8 with regard to Miss Eller?  
9 A. Everybody followed up. That's our  
10 professional responsibility. So whether or not we agreed  
11 or disagreed, we still followed up.  
12 Q. So would you say that any -- would you  
13 characterize the administration's response to Miss Eller  
14 as being deliberately indifferent in any respect?  
15 MR. RODRIGUEZ: Objection.  
16 A. Absolutely not.  
17 Q. Did you -- did you have a hunch that Miss  
18 Eller was going to sue the school system at any time?  
19 A. As I look back on how things were worded, I  
20 would say yes.  
21 Q. What -- what makes you think that way now?  
22 A. Just specifically in relation to -- and I

01:40:38 1 don't want to say -- I'll say another teacher, giving  
2 discipline or talk about what a child may have done, the  
3 actual follow-up was not so extensive at times and they  
4 were very much so respective of our process versus us  
5 wanting to always give specifics and details about  
6 everything.

7 Q. Okay. Did you believe that Miss Eller was  
8 treated differently at the school because of her  
9 transgender status?

10 MR. RODRIGUEZ: Objection.

11 A. Absolutely not.

12 Q. Do you believe that the school created a  
13 hostile work environment to Miss Eller because of her  
14 transgender status?

15 MR. RODRIGUEZ: Objection.

16 A. No.

17 Q. Going back to Caring Colors -- and I  
18 apologize for jumping back and forth -- if a staff member  
19 such as Miss Eller sponsored a club such as that, were  
20 they given any type of additional compensation for doing  
21 so?

22 A. So again, I can't answer that one. Because

01:43:19 1 A. English teacher.  
2 Q. Let me talk about AP scores for a second.  
3 Or AP classes.

4 Would teachers receive additional  
5 compensation for teaching AP classes?

6 A. I don't believe they do, no.

7 Q. So the removal of a -- of an AP class from a  
8 teacher would have no bearing on their compensation,  
9 would it?

10 A. No.

11 Q. No bearing on their benefits, would it?

12 A. No.

13 Q. And it didn't alter the terms and conditions  
14 of their employment, did it?

15 MR. RODRIGUEZ: Objection.

16 A. No.

17 Q. And Miss Eller was removed from her AP  
18 assignments at some point, was she not?

19 A. Yes, she was.

20 Q. Were there other teachers in the school that  
21 were also removed from their respective AP classes?

22 A. Yes.

01:41:48 1 there are stipulations for people to receive emoluments  
2 based upon their club or organization. Some are paid  
3 emoluments, meaning that some teachers who sponsor  
4 activities are paid activities and some are not. So I'm  
5 not sure what their income is.

6 Q. Now, the grade level administrator would  
7 deal with concerns by staff and students in a respective  
8 grade level; correct?

9 A. That's correct.

10 Q. Who dealt with concerns between staff  
11 members at the school? So if a teacher had a problem  
12 with another teacher, who would typically deal with that?

13 A. That would be either an assistant principal  
14 or the principal, but mainly the principal was the one  
15 who was supposed to be the mediator between the two.

16 Q. Who is Miss Sidbury? Did I say that right?  
17 Looking at Exhibit 46. Did I say it wrong? Sidbury?

18 A. You said 46? Sidbury.

19 Q. Yeah. Sidbury, I apologize.

20 A. She is an English teacher at Friendly High  
21 School.

22 Q. She is who?

01:44:23 1 Q. Do you know that firsthand?

2 A. I do know that firsthand. Don't ask me who,  
3 though, but I do know firsthand.

4 Q. Was their removal based on the same  
5 criteria, such as student scores?

6 A. Absolutely.

7 Q. Was that the sole basis of the removal of AP  
8 teachers?

9 A. Absolutely.

10 Q. Didn't have anything to do with Miss Eller's  
11 transgender status --

12 MR. RODRIGUEZ: Objection.

13 A. No.

14 Q. -- did it?

15 A. No, it did not.

16 MR. SHARMA: I'd like to take a short  
17 break.

18 MR. RODRIGUEZ: Yeah.

19 MR. SHARMA: Just give me five minutes  
20 and I'll just collect my notes.

21 MR. RODRIGUEZ: Okay.

22 (RECESS, 1:44 p.m. - 1:52 p.m.)

01:52:57 1 BY MR. SHARCK:

2 Q. Going back to the PS74s for a moment, would

3 Miss Eller be able to complete PS74 reports without the

4 name of a student?

5 A. Yes.

6 Q. How would she do that?

7 A. She could just say the unidentified student,

8 just give a specific description of the child or, with

9 the time and place that the incident took, and then we

10 can always go back on the camera to figure out who the

11 child --

12 (Clarification requested by the Court Reporter.)

13 A. She can state on the PS74 that the child was

14 unknown or unidentified, state the time and the place at

15 which the incident took place, and then we can always go

16 back to the camera to look to see who the child was.

17 Q. Just wanted to make sure I heard you

18 correctly earlier. You said that there were no

19 electronic copies of the PS74 reports?

20 A. That's correct.

21 Q. Did you personally ever receive any PS74

22 reports from Miss Eller?

01:54:42 1 situation.

2 Q. So if a situation was resolved to Miss

3 Eller's satisfaction, it's possible that she may not have

4 submitted a PS47 report?

5 MR. RODRIGUEZ: Objection.

6 A. That's correct.

7 Q. Did Miss Eller ever submit to you a

8 Bullying, Harassment Or Intimidation Form?

9 A. No.

10 Q. You said earlier, and I had it written down

11 in quotes, Miss Eller wanted to do the training.

12 A. Yes.

13 Q. Was that the training that she wanted to

14 implement at the school for the students about

15 transgender issues?

16 A. Her -- to my recollection, her training that

17 she wanted to provide was for the staff.

18 Q. Okay. For the staff?

19 A. Yes.

20 Q. She wanted -- she herself wanted to do the

21 training?

22 A. That's correct.

01:55:54 1 A. Yes, I did.

2 Q. Do you know how many?

3 A. I do not.

4 Q. Were they often?

5 MR. RODRIGUEZ: Objection.

6 Q. If you can recall.

7 A. I can't recall, but I would say no.

8 Q. Okay. Now, many of the e-mails that we

9 looked at today, I don't see any attachments with PS74

10 reports.

11 A. That's correct.

12 Q. So in cases such as these, would -- do you

13 know if they were even generated? Was she asked to fill

14 one out --

15 MR. RODRIGUEZ: Objection.

16 A. I would say not --

17 Q. -- or was it just handed without a PS74

18 report?

19 MR. RODRIGUEZ: Objection.

20 A. Not on intention -- it was stated to fill

21 out the PS74 so we could have that documentation; but out

22 of respect and courtesy, we would still deal with the

01:55:39 1 Q. What type of training did she think she was

2 qualified to train others on?

3 A. That, I have no idea; but her topic she

4 wanted to center around was, I'm going to infer, equity

5 amongst all.

6 Q. And she told you this?

7 A. She inferred that. She didn't state it

8 directly, but she inferred it. She did state directly

9 she wanted to be the one doing the training.

10 Q. What was your response to that?

11 A. My response was you need to see Mr. Adams.

12 Q. Do you know if she saw Mr. Adams?

13 A. I do not know.

14 Q. Did Mr. Adams ever mention to you that Miss

15 Eller came to him and asked for training?

16 A. No. The only time that we were together

17 collectively when that happened was when we had that

18 initial meeting.

19 Q. Were you surprised to hear that she wanted

20 to do the training?

21 A. I was surprised, yes.

22 Q. Why?

01:56:10 1 A. I just didn't think that would be something  
 2 that she would ask to do.  
 3 Q. Do you remember when she asked you that?  
 4 A. It was during that initial meeting.  
 5 Q. Did you ever retaliate against Miss Eller?  
 6 MR. RODRIGUEZ: Objection.  
 7 A. No.  
 8 Q. Do you know what retaliation means?  
 9 A. I do.  
 10 Q. Never did that?  
 11 A. No, I had no reason to.  
 12 Q. Training. Spent a lot of time on training  
 13 this morning.  
 14 My understanding is that at the  
 15 beginning of every school year, every single Prince  
 16 George's County Public Schools employee has to go through  
 17 an online training module system?  
 18 A. That's correct.  
 19 Q. And at the conclusion of the module system,  
 20 which lasts a couple of hours, they have to do these  
 21 self-assessed quizzes and tests and things like that?  
 22 A. That's correct.

01:57:58 1 THE WITNESS: Okay.  
 2 MR. SHARMA: Thank you, sir.  
 3 THE WITNESS: Okay.  
 4 MR. SHARMA: He may have some follow-up.  
 5 RE-EXAMINATION  
 6 BY MR. RODRIGUEZ:  
 7 Q. Just a couple of questions.  
 8 When teachers reported student  
 9 misbehavior, did they always file PS74s?  
 10 A. They did not always file PS74s, no.  
 11 Q. Did they sometimes report that misbehavior  
 12 via e-mail?  
 13 A. Yes.  
 14 Q. Did they sometimes report it orally?  
 15 A. Yes.  
 16 Q. Did the manner in which a teacher reported  
 17 student misbehavior affect whether you investigated it?  
 18 A. Can you restate that again?  
 19 Q. Sure.  
 20 Did the manner in which the teacher  
 21 reported student misbehavior affect whether you  
 22 investigated the report?

01:57:00 1 Q. To the best of your recollection, are one of  
 2 those training modules on diversity in the workplace or  
 3 treating people with respect or any types of those  
 4 issues, if you can recall?  
 5 A. You know, I can't recall off the top of my  
 6 head.  
 7 Q. Okay. And were there also not staff  
 8 meetings monthly at Friendly High School?  
 9 A. There were monthly staff meetings, yes.  
 10 Q. Do you know if any issues with respect to  
 11 training the staff came up in those monthly meetings?  
 12 A. Issues on training the staff?  
 13 Q. Mm-hmm. Or different types of trainings  
 14 during those meetings?  
 15 A. Yes. There were several different types of  
 16 trainings.  
 17 Q. Do you know if -- I'm sorry. Do you know if  
 18 diversity training or treating people fairly or with  
 19 equity, as you put it earlier, do you know if that ever  
 20 came up to the best of your recollection?  
 21 A. I cannot recall that that was a topic.  
 22 MR. SHARMA: I think that's all I have.

01:58:30 1 A. No. Took every report seriously.  
 2 Q. Did the manner in which the teacher reported  
 3 the student misbehavior affect whether you imposed  
 4 discipline on the student?  
 5 A. No.  
 6 Q. Did the manner in which the teacher reported  
 7 misbehavior affect whether you recorded punishment?  
 8 A. No.  
 9 Q. Now, you stated that sometimes at Friendly,  
 10 and I'll use Mr. Sharma's words, just some loosey-goosey  
 11 stuff regarding forms.  
 12 So I want to ask you if the PS74s at  
 13 Friendly High School were always returned to teachers?  
 14 A. From my perspective and my stance from me  
 15 personally, yes.  
 16 Q. Okay. But you can't speak as to --  
 17 A. I can't speak on everybody else's forms.  
 18 Q. When you left Friendly, did you keep any of  
 19 the PS74s that were given to you?  
 20 A. I did not.  
 21 Q. And you stated that Miss Eller sometimes  
 22 asked for more specifics and details about the discipline

02:00:03 1 process that other teachers; correct?

2 A. That is correct.

3 Q. Did the administration consider that a bad

4 thing?

5 A. I can't speak for administration. I can

6 speak for myself. I did not consider it a bad thing. I

7 was an obvious administrator so I took it as a challenge,

8 and I -- it helped build my capacity around our conduct

9 also. Code of conduct, rather.

10 Q. So her asking you for specifics and details

11 helped you?

12 A. It did assist me, yes.

13 Q. Was the fact that Miss Eller asked about

14 specific and details even a subject of a meeting between

15 Principal Adams and the assistant principals?

16 A. No.

17 Q. I'm going to ask you to turn back to Exhibit

18 39. Now, you stated in response to a question from

19 Mr. Sharma that Miss Eller asked you during this meeting,

20 or expressed during this meeting that she wanted to lead

21 the training; correct?

22 A. I believe so, yes.

02:02:39 1 with staff, can they meet with me first." Correct?

2 A. That's correct.

3 Q. Does that indicate to you that Miss Eller

4 was referring to herself --

5 A. No.

6 Q. -- as the trainer?

7 A. Not at all. But it indicates that she wants

8 to speak with whoever is coming in. Right.

9 Q. But not that she wants to do the training?

10 A. No. It does not state that, no.

11 Q. It states the opposite.

12 A. Yes.

13 Q. Final question. You spoke about online

14 modules with Mr. Sharma.

15 A. Yes, that's correct.

16 Q. When did those online modules start?

17 A. I want to say maybe 2000 -- maybe the

18 2015-'16 school year or the '17 -- '16-'17 school year.

19 It didn't start my first year at Friendly.

20 MR. RODRIGUEZ: That's it.

21 THE WITNESS: Okay.

22 MR. SHARMA: Just a follow up.

02:04:21 1 Q. Is that anywhere in these meeting notes?

2 A. Let me review.

3 So I see where it says, would like the

4 diversity training to address the sensitivity of the

5 subject matter.

6 Q. Yes.

7 A. And that is where I recall being centered

8 around. I may not have recorded it, but I do remember

9 that being the topic of the conversation, if she could be

10 the one to lead it.

11 Q. Okay. Now, earlier today, though, you

12 stated that unless there was an outside speaker coming --

13 A. Yes.

14 Q. -- Principal Adams could approve a training

15 or an assembly; correct?

16 A. That is correct.

17 Q. And here, Principal Adams responded that he

18 would have to speak with Mr. Fossett and labor relations

19 regarding the subject matter; correct?

20 A. That's a yes.

21 Q. At the bottom, the second-to-last line says,

22 "If possible, can whoever comes to address this issue

02:03:29 1 RE-EXAMINATION

2 BY MR. SHARMA:

3 Q. Mr. Thompson, do you know if Miss Robinson

4 ever apologize to Miss Eller?

5 A. She did apologize to Miss Eller.

6 Q. Was it in writing or was it verbal?

7 A. I think it was a verbal apology, but I was

8 not present. I just remember the conversation. And I

9 remember because Miss Eller didn't feel like it was

10 genuine.

11 Q. Okay. And she expressed that to you at this

12 meeting?

13 A. I believe so.

14 Q. What was her state of mind when this meeting

15 concluded?

16 MR. MOGUL: Objection.

17 MR. RODRIGUEZ: Objection.

18 A. That --

19 MR. SHARMA: The more the merrier,

20 right.

21 A. You both said it at the same time.

22 Q. Did you get a sense that she was satisfied

02:04:07 1 or was she still in distress or --

2 MR. RODRIGUEZ: Objection.

3 A. I had -- so from the conclusion of the  
4 meeting, Miss Eller was definitely content with the  
5 outcome of the meeting.

6 Q. Okay.

7 MR. SHARMA: Any follow-up? That's all  
8 I have.

9 MR. RODRIGUEZ: Yeah.

10 RE-EXAMINATION

11 BY MR. RODRIGUEZ:

12 Q. She stated in this meeting, according to  
13 your notes, that she e-mailed Miss Crosby and asked for  
14 suggestions and said that she wanted to talk after school  
15 to fill out a 4170 form; correct?

16 A. Correct.

17 Q. Does that strike you as something that  
18 someone that was content with the way that meeting ended  
19 would do?

20 A. To my knowledge, again, I would say yes. As  
21 that was a directive from her union representative, as  
22 Miss Crosby was her union representative, so that was the

1 CERTIFICATE OF COURT REPORTER

2  
3 I, Marjorie Peters, Fellow of the Academy of  
4 Reporters (FAPR), Registered Merit Reporter (RMR), the  
5 officer before whom the foregoing depositions was taken,  
6 do hereby certify that the witness whose testimony appears  
7 in the foregoing deposition was duly sworn by me, that  
8 the testimony of said witness was taken by me  
9 stenographically and thereafter reduced to typewriting  
10 under my direction; that said deposition is a true record  
11 of the testimony given by said witness; that I am neither  
12 counsel for, related to, nor employed of any attorney or  
13 counsel employed by the parties hereto, nor financially  
14 or otherwise interested in the outcome of the action.

15  
16  
17 MARJORIE PETERS  
18 Notary Public in and for  
19 The District of Columbia  
20 My commission expires: October 31, 2024

21  
22

02:05:04 1 directive she got from the union.

2 Q. Okay. Fine.

3 MR. RODRIGUEZ: Thank you very much.

4 MR. SHARMA: You have a right to -- we  
5 can go off. But you have a right to read and get a copy  
6 of the transcript and read, make any changes or you can  
7 just waive that right, and the transcript is what it is.

8 THE WITNESS: I waive it, it is what it  
9 is.

10 MR. SHARMA: He said he'll waive. Thank  
11 you so much.

12 (SIGNATURE waived.)

13 (CONCLUDED, 2:05 p.m.)

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
Southern Division

JENNIFER ELLER  
Plaintiff,  
VS  
PRINCE GEORGE'S COUNTY  
PUBLIC SCHOOLS, et al.,  
Defendants.

)  
)  
) Case No.:  
) 18-cv-03649-TDC  
)  
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DEPOSITION OF COURINEY KING  
Friday, January 24, 2020, 10:00 a.m.

Arnold & Porter Kaye Scholer  
601 Massachusetts Avenue, NW  
Washington, DC

1 DEPOSITION OF COURINEY KING,  
2 a witness herein, called by the Plaintiff for  
3 examination, taken pursuant to the Federal Rules of  
4 Civil Procedure, by and before Susan E. Alldrige,  
5 RPR and Notary Public in and for the District of  
6 Columbia, Arnold and Porter, 601 Massachusetts  
7 Avenue, NW, Washington, DC, on Friday, January,  
8 2020, at 10:00 a.m.

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A P P E A R A N C E S

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2  
3  
4  
5 ON BEHALF OF PLAINTIFF JENNIFER ELLER:  
6 TOM MCSORLEY, ESQUIRE  
7 ARNOLD & PORTER KAYE SCHOLER LLP  
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11  
12  
13 ON BEHALF OF PLAINTIFF JENNIFER ELLER:  
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17 Suite 722  
18 Washington, DC 20006  
19 (202) 804-6245  
20  
21  
22

A P P E A R A N C E S, Cont.

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2  
3 A P P E A R A N C E S, Cont.  
4  
5 ON BEHALF OF PRINCE GEORGE'S COUNTY PUBLIC SCHOOLS,  
6 ET AL., DEFENDANTS:  
7 AMIT K. SHARMA, ESQUIRE  
8 MCCOLLUM & ASSOCIATES, LLC  
9 7309 Baltimore Avenue  
10 Suite 117  
11 College Park, MD 20740  
12 (301) 864-6070  
13  
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10:02:15 1 reporter can read it back.  
 2 A Okay.  
 3 Q All right. And finally, let me know if  
 4 you need a break. The only issue there is that if  
 5 there's a question pending, you'll need to answer  
 6 the question before we take the break.  
 7 A Okay.  
 8 Q Okay. Great.  
 9 Do you have any questions about how this  
 10 will work?  
 11 A No.  
 12 Q Great.  
 13 Is there any reason you can think of why  
 14 you won't be able to answer my questions fully  
 15 today?  
 16 A No.  
 17 Q Okay. Are you on any medications or  
 18 alcohol that would impair your ability to answer my  
 19 questions?  
 20 A No.  
 21 Q Okay. I didn't think so. I just need to  
 22 ask.

10:02:51 1 And do you have any physical limitations  
 2 that we should be aware of to make sure this goes  
 3 okay?  
 4 A No. I just may be coughing a lot, but  
 5 that's it.  
 6 Q Understood.  
 7 Okay. So you are aware that this  
 8 deposition concerns Jennifer Eller; correct?  
 9 A Yes.  
 10 Q And Jennifer Eller identifies as female.  
 11 You are aware of that?  
 12 A Yes.  
 13 Q As such, we'll be referring to  
 14 Jennifer Eller using female pronouns and honorifics  
 15 such as Ms. Eller consistent with her female gender  
 16 identity, and we ask you do the same.  
 17 Does that make sense?  
 18 A Yes.  
 19 Q Thank you.  
 20 Okay. First, do you understand that  
 21 you're not named as a defendant in this case?  
 22 A Yes.

10:03:31 1 Q Have you retained an attorney with  
 2 respect to this case?  
 3 A No.  
 4 Q Okay. Have you met Mr. Sharma before?  
 5 A Yes.  
 6 Q Okay. Have you met someone named  
 7 Mr. McCollum? James McCollum?  
 8 A I don't recall.  
 9 Q That's fine.  
 10 You understand that Mr. Sharma represents  
 11 the defendants in this case and he may object to  
 12 questions that I ask, and that's fine. But you're  
 13 free to continue to answer the question even if  
 14 Mr. Sharma objects as the objection is for the Court  
 15 when reviewing the transcript.  
 16 A Okay.  
 17 Q Have you spoken with Mr. Sharma before  
 18 today's deposition?  
 19 A Yes.  
 20 Q Do you know when that was?  
 21 A I don't know the exact date. It was  
 22 during the summer. It was before school started.

10:04:17 1 Q Okay.  
 2 A So, like, maybe August.  
 3 Q And was that on the phone or in person?  
 4 A It was in person.  
 5 Q And who else was there when you spoke?  
 6 A It was just him.  
 7 Q Okay. What did you speak about?  
 8 A We spoke about this case and just asked  
 9 me what I knew about Ms. Eller.  
 10 Q Okay. Did he tell you anything about  
 11 having a deposition in the case?  
 12 A I believe so, yes.  
 13 Q And do you remember if he asked you to do  
 14 anything to prepare for the deposition?  
 15 A No. Just wait for the date and time.  
 16 Q Okay. Did he ask you to look at any  
 17 documents before coming in for the deposition?  
 18 A No.  
 19 Q Fine.  
 20 Did you do anything to prepare for the  
 21 deposition today?  
 22 A No.

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10:05:09 1 Q Okay. That's fine.  
 2 Did you review any documents before  
 3 today's deposition?  
 4 A No.  
 5 Q All right. Did you speak with anyone  
 6 else about today's deposition?  
 7 A No. The only person, my supervisor,  
 8 letting him know I was taking -- I'll be here, but  
 9 that's it.  
 10 Q Got it.  
 11 And when you spoke to your supervisor,  
 12 did you talk about what you might say today?  
 13 A No.  
 14 Q Okay. Did you bring any documents with  
 15 you today?  
 16 A No.  
 17 Q Okay. And how did you learn that  
 18 Ms. Eller was suing Prince George's County Public  
 19 Schools in the first place?  
 20 A I got the notification from the Office of  
 21 General Counsel.  
 22 Q Okay.

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10:05:44 1 A Our school district.  
 2 Q And was that a letter?  
 3 A I believe it was an email.  
 4 Q Okay. And did that notification tell you  
 5 to do anything?  
 6 A Uh-uh. No.  
 7 Q Okay. Have you spoken to anyone about  
 8 Ms. Eller's lawsuits?  
 9 A No.  
 10 Q Okay. Great.  
 11 All right. So just, now, before we get  
 12 into some other issues about Ms. Eller, if you could  
 13 just provide a little bit of background.  
 14 So, first, what's your educational  
 15 background?  
 16 A I'm a graduate of Howard University,  
 17 undergraduate as well as graduate degree. This is  
 18 my 22<sup>nd</sup> year as an educator in the county. Going  
 19 on my 10<sup>th</sup> year as principal of James Madison  
 20 Middle School. I began in July of 2010; so I'm  
 21 embarking upon my 10<sup>th</sup> year.  
 22 After graduating from Howard, I returned

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10:06:35 1 to my alma mater, high school alma mater, as an  
 2 English teacher, Parkdale High School in Riverdale.  
 3 I worked there for a number of years as an English  
 4 teacher. Then I was promoted to assistant  
 5 principalship. And then from there I was promoted  
 6 to principalship to -- at James Madison Middle  
 7 School.  
 8 Q Okay. So congratulations on ten years at  
 9 James Madison.  
 10 A Thank you.  
 11 Q So when did you start at Parkdale as a  
 12 teacher?  
 13 A '97.  
 14 Q Okay.  
 15 A August of '97. Uh-huh.  
 16 Q And then how many years were you a  
 17 teacher?  
 18 A Well, really, about five -- five --  
 19 five years. Uh-huh. And then I went to assistant  
 20 principalship.  
 21 Q And that was also at Parkdale?  
 22 A Yes.

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10:07:19 1 Q And then in 2010, you were hired as  
 2 principal at James Madison?  
 3 A Uh-huh. Yes.  
 4 Q Great.  
 5 Okay. So going forward, my questions  
 6 today will really be limited to the time period of  
 7 August to October 2016.  
 8 A Uh-huh.  
 9 Q You can confirm you were the principal of  
 10 James Madison during that entire period?  
 11 A Yes.  
 12 Q And you didn't have any significant leave  
 13 during that time period?  
 14 A No.  
 15 Q Okay. So just keep that time frame in  
 16 mind as I'm asking questions.  
 17 A Okay. That's fine.  
 18 Q Okay. So can you explain the  
 19 organization of the senior leadership of  
 20 James Madison in the fall of 2016?  
 21 So you were principal?  
 22 A Uh-huh. I have -- during that time, I

10:05:07 1 had two assistant principals. During that time, we  
2 were only 7<sup>th</sup> and 8<sup>th</sup> grade. So I had assistant  
3 principal over the 7<sup>th</sup> grade; I had assistant  
4 principal over the 8<sup>th</sup> grade.

5 Ms. Eller taught 8<sup>th</sup> grade; so the  
6 assistant principal over 8<sup>th</sup> grade was Mr. Connelin.  
7 The 7<sup>th</sup> grade assistant principal was  
8 Ms. Catherine Proctor.

9 So far as the leadership -- that's the  
10 top leadership tier, if you will. Then, of course,  
11 we had department chairs and team leaders. I don't  
12 know if you want me to share that or not -- I mean,  
13 all those positions.

14 Q If you could just -- I don't think we  
15 need the names, specific names, of people --

16 A Okay.

17 Q -- in those positions. But if you could  
18 describe sort of the way the leadership works.

19 A Okay. So then we had the principalship.  
20 And then, of course, underneath the tier is the  
21 assistant principals. And then under that tier is  
22 our department chairs for each content matter that

10:09:01 1 we have.

2 And then with us being a middle school,  
3 we operate in a team system, if you will. So  
4 underneath, if you will, the tier underneath,  
5 department chairs are team leaders. And the team  
6 leaders are based on the grade. So we had a  
7 6<sup>th</sup> grade team leader, a 7<sup>th</sup> grade team leader.  
8 And then we also had a team leader for our  
9 electives. And that was really it. Yeah.

10 Q Okay. So Ms. Eller -- other than  
11 Mr. Connelin, who would have been -- who were  
12 employees who were in leadership positions above  
13 Ms. Eller?

14 A Mr. Connelin and myself.

15 Q Okay.

16 A Uh-huh.

17 Q So in terms of student discipline, do the  
18 assistant principals share responsibility for just  
19 the grades that they're over?

20 A Exactly.

21 Q Okay. So Mr. Connelin would have been  
22 responsible for discipline over 8<sup>th</sup> grade?

10:09:56 1 A Yes.

2 Q Okay.

3 A Now, of course, you know, I mean, we all  
4 chip in. But technically he's the person who deals  
5 with 8<sup>th</sup> grade discipline. If he's absent or  
6 something of that nature, then the other  
7 administrators and myself, or the 7<sup>th</sup> grade  
8 administrator, will take charge. Uh-huh.

9 Q Okay. What about complaints against  
10 faculty members? Who would have handled that?

11 A Complaints against faculty members will  
12 come to me.

13 Q Okay.

14 A Uh-huh.

15 Q How about decisions about salary and  
16 benefits? Would that have been your responsibility?

17 A No. That's human resources.

18 Q Okay. What about approving leave?

19 A Approving leave will come to me. Uh-huh.

20 Q All right. And then what about the  
21 classes that a teacher is assigned to?

22 A I will assign -- that's based on -- well,

10:10:46 1 me. Ultimately, I'm the -- make -- the one -- make  
2 the decision.

3 Q Okay. So the -- would you consult with  
4 vice principals in making those decisions, or you  
5 would make --

6 A We will consult --

7 Q -- that decision?

8 A I will consult with our school planning  
9 management team. So that basically consists of our  
10 department chairs, our administrators, as well as  
11 our team leaders. Uh-huh. And also my scheduler is  
12 on that team as well. Uh-huh.

13 Q How about evaluations of teachers? Who  
14 was responsible for doing that?

15 A For -- for observations, administrators  
16 can conduct -- all administrators can conduct  
17 observations. But for evaluations, only the  
18 principal.

19 Q Okay. So then in your role as principal  
20 in fall 2016 --

21 A Uh-huh.

22 Q -- who did you report to?

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10:11:34 1 A I reported to my instructional director.  
 2 Oh, my gracious.  
 3 2016. I believe it was Susan Holiday. I  
 4 believe she was the ID during that time.  
 5 Q And what is the position of instructional  
 6 director?  
 7 A It varies. But during that time, in  
 8 2016, the instructional director is responsible over  
 9 a cohort of schools. So she just wasn't responsible  
 10 as far as oversight of James Madison, but other  
 11 schools as well.  
 12 And she just ensures that we are  
 13 following the policies, esp- -- more -- more on the  
 14 instructional side. More on the instructional side;  
 15 so -- you know, how we're utilizing our data. What  
 16 we're doing to meet state assessments, state  
 17 requirements. Any -- if we had situations with a  
 18 faculty member, anything of that nature, it had to  
 19 go beyond me, then I will go to my instructional  
 20 director.  
 21 So anything which I could no longer  
 22 approve or I needed additional insight, I would take

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10:12:42 1 it to my instructional director. Uh-huh.  
 2 Q Okay. So as principal, were you required  
 3 to bring any student discipline matters to the  
 4 attention of your instructional director?  
 5 A No.  
 6 Only time, really, instructional director  
 7 would have privy of that is if a parent felt as  
 8 though I didn't handle it or the school didn't  
 9 handle it correctly, then they called the ID. Yes.  
 10 Q Okay. So if there was an issue, you may  
 11 hear about it from your instructional director  
 12 because the parent --  
 13 A Exactly.  
 14 Q -- called?  
 15 A Uh-huh.  
 16 Q Okay. So you can't think of any  
 17 situation where the school district policy would  
 18 have required you to escalate a student discipline  
 19 matter to your ID?  
 20 A I wouldn't say necessarily take it to the  
 21 ID. But I will call to inform her of the matter.  
 22 Especially, say, for instance, if it was --

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10:13:45 1 something was expellable; right? Or if it was a --  
 2 an incident that was -- that was really major;  
 3 right? Like a group fight or something --  
 4 something -- or cause some bodily injury with the  
 5 students, you know.  
 6 If I had to -- then, I would call to  
 7 inform her. Not to say, "Can you handle this," but  
 8 "Let me let you know what's going on" so she could  
 9 be fully abreast.  
 10 Q Can you think of, in your time as  
 11 principal, your having done that call? Called the  
 12 ID about a student discipline matter?  
 13 A Yes. Now, not during -- are you talking  
 14 about this -- during this time?  
 15 Q That's a good --  
 16 A In 2016?  
 17 Q Good clarification.  
 18 So I guess during the fall of 2016, can  
 19 you think of any?  
 20 A No.  
 21 Q Okay. What about if there were instances  
 22 of repeated disrespectful behavior towards a

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10:14:54 1 teacher? Would you have contacted your ID with  
 2 respect to that?  
 3 A No.  
 4 Q Okay.  
 5 A Uh-uh.  
 6 Q What about complaints about a teacher or  
 7 a staff member? Would you bring that to the  
 8 attention of your ID?  
 9 A It all depends on the -- the severity of  
 10 it, if you will. Many things we can just handle  
 11 right in-house. But if I felt it was necessary --  
 12 but during that time, I can't recall of any.  
 13 Uh-huh.  
 14 Q Okay. Are there any school district  
 15 policies about when it would be required to bring  
 16 something up with your leadership?  
 17 A I mean, Ms. Holiday and I had a really  
 18 good rapport. I may -- I may let her know, but not  
 19 more so like I had to let her know.  
 20 If I felt -- again, if I felt as though  
 21 it was something that was beyond my authority or  
 22 beyond my control of me trying to remedy the

09:16:06 1 situation, I may call her, you know, for advice, see  
 2 what we can do.  
 3 But I really haven't had major issues  
 4 like that at Madison --  
 5 Q Good.  
 6 A -- yeah -- to be honest with you.  
 7 Q Do you -- so I guess you sort of just  
 8 answered this question, but just to confirm, you  
 9 don't recall having to bring an issue related to  
 10 complaints against a faculty member to your ID?  
 11 A Not during that time, no.  
 12 Q Okay.  
 13 A Uh-uh.  
 14 Q So just to confirm, Mr. Connelin was the  
 15 assistant principal over 8<sup>th</sup> grade?  
 16 A Yes.  
 17 Q During that time, Ms. Holiday was your  
 18 ID?  
 19 A Yes.  
 20 Q Who was Helen Coley?  
 21 A Helen Coley, during that time, was the  
 22 associate superintendent, if my memory serves me

10:16:59 1 correctly.  
 2 So how it works is -- you talking about  
 3 hierarchy. You have your associate superintendent.  
 4 And I believe during that time -- were they -- the  
 5 county is broken up into areas, and so I'm -- it  
 6 changes with your -- with your CEO; so we have a --  
 7 that was a different CEO during that time.  
 8 So Dr. Coley, I believe, was the  
 9 associate superintendent. So under Dr. Coley, she  
 10 would have her IDs and then the principals, and  
 11 then -- yeah. So I believe -- I'm not sure if her  
 12 exact title was associate superintendent, but -- I  
 13 believe it was associate superintendent. Uh-huh.  
 14 So she was the person above Ms. Holiday. That's the  
 15 person Ms. Holiday will report to. Uh-huh.  
 16 Q So your leadership was Ms. Coley, then  
 17 Ms. Holiday, and then yourself?  
 18 A Right.  
 19 Well, really, our CEO, which, during that  
 20 time, may have been Dr. Maxwell, then associate  
 21 superintendent, then ID.  
 22 Q Understood.

10:15:07 1 How about someone named Armana Simmons?  
 2 A I don't know that person.  
 3 Q Okay.  
 4 A Armana Simmons. Uh-huh.  
 5 Q Okay. And just to make sure I understand  
 6 it -- I'm not basing this on anything that I know  
 7 about. I'm just asking.  
 8 A Uh-huh.  
 9 Q During this time, in fall 2016, were  
 10 there any policies in place related to when you  
 11 would have to raise issues related to gender  
 12 identity to your supervisor?  
 13 A I can't -- I don't remember. I can't  
 14 recall.  
 15 Q Did you ever receive any guidance from  
 16 supervisors about how to handle issues of gender  
 17 identity at James Madison?  
 18 A I mean, as far as this situation, when  
 19 the situation came up. But I didn't -- I didn't  
 20 have any -- we didn't have any, like, issues,  
 21 really, with that -- with this -- with this  
 22 situation. We had some but nothing major, because

10:19:20 1 she was there a short period of time.  
 2 Q To clarify, you're saying Ms. Eller was  
 3 only at James Madison a short period of time; so you  
 4 don't remember getting guidance from the district  
 5 about Ms. Eller.  
 6 A No.  
 7 Q I'm just talking before -- we're going  
 8 to --  
 9 A Right.  
 10 Q -- talk about Ms. Eller in a moment.  
 11 A Okay.  
 12 Q Just more generally, has there been  
 13 communications from the school district related to  
 14 gender identity?  
 15 A No. I treat everyone -- you treat  
 16 everyone the same. Equity across the board.  
 17 Q Understood.  
 18 A Yeah.  
 19 Q All right. Let's talk about Ms. Eller.  
 20 A Okay.  
 21 Q So when did you first come to know about  
 22 Ms. Eller?

10:20:12 1 A She was placed at my school. We had a  
2 vacancy. We had a vacancy for our English 8  
3 position, teaching position.

4 And so when you have vacancies like that,  
5 what happens is -- there are times when I'm in the  
6 interview and can recommend someone; and then there  
7 are times when HR, human resources, will contact me,  
8 say, "We have a teacher who we need to place."

9 So that's what I received. I received a  
10 call from human resources letting me know that  
11 Ms. Eller was being placed at Madison to fill that  
12 English 8 vacancy.

13 Q Do you know why Ms. Eller was  
14 transferring to James Madison?

15 A No. I just know she had been out on  
16 leave. And so she was coming back to the county,  
17 and she needed -- they needed to place her.

18 And so I don't know if she -- I don't  
19 know if she requested for middle school or not, but  
20 we had a vacancy; so --

21 Q And who would make the decision to place  
22 her within a particular vacancy?

10:21:05 1 A That would be human resources.

2 Q Would the ID have a say in that?

3 A I don't know. They just call me and say  
4 Ms. Eller's coming to your building or place; so --  
5 I'm not sure.

6 Q When she was placed at your school, were  
7 you aware of the issues she had had at her previous  
8 school, Friendly High School?

9 A I was not aware. I was -- I was -- I was  
10 told that she had some issues, but I don't think --  
11 I think she was at Kenmoor before me. I don't think  
12 she was at Friendly High School before. I think --  
13 I was just told that she was being transferred from  
14 Kenmoor Middle School. I think it was Kenmoor. I  
15 don't think it was Friendly.

16 Q Okay. So you received a phone call at  
17 some point in the summer of 2016 telling you  
18 Ms. Eller was filling the 8<sup>th</sup> grade English  
19 position?

20 A I think it was either right -- during the  
21 summer, or it may have been right -- I want to say  
22 school had already started, but it was like right in

10:22:15 1 the beginning of the school year. Like maybe the  
2 first two weeks of school, because it was just -- it  
3 was vacant.

4 And so I don't think it was even during  
5 that -- I think it was like right before the --  
6 right when school had already begun, but like the  
7 early part. Uh-huh.

8 Q So the phone call you received about  
9 Ms. Eller filling the vacancy, was anything else  
10 said about Ms. Eller on that phone call?

11 A Not that I recall. Just that she was  
12 being placed. And they gave me the date that she  
13 will come and -- yeah.

14 Q Okay. And had you then asked anyone  
15 about Ms. Eller after --

16 A No.

17 Q -- you received this notice?

18 A Uh-huh. This -- teachers being placed at  
19 the school is a very common practice. So I just  
20 wait until they come, meet them, and let's get  
21 started.

22 Q Okay. So you don't typically call up the

10:23:08 1 old principal --

2 A No.

3 Q -- to see about the teacher?

4 A I don't. I don't. Because -- and one  
5 reason why I don't is I'm like it's a -- whatever  
6 the situation -- and then I didn't even know -- I  
7 just knew this person was coming off leave; right?

8 So my mind-set is let's come here and  
9 teach my babies. All right? So you're going to be  
10 here. So me calling and finding out is not going to  
11 do anything because you're still going to be here.  
12 So let's get rolling.

13 So I didn't call any principals or --  
14 finding out -- I don't -- that's just not my  
15 practice, period.

16 Now, if I interview the person for  
17 recommendations, that's something different. But  
18 when the county is going to place a person in the  
19 schoolhouse, sometimes -- I don't even need to know  
20 because, like I said, the person is going to be  
21 there; so -- I need -- I want to start -- I want  
22 that person to be able to start fresh, I can start

10:23:53 1 fresh without being tainted or anything of that  
 2 nature.  
 3 Q That makes sense.  
 4 A Uh-huh.  
 5 Q Did you know then that Ms. Eller was  
 6 transgender before she started working at  
 7 James Madison?  
 8 A I don't think so, no.  
 9 Q So do you remember when you first came to  
 10 understand that Ms. Eller was transgender?  
 11 A I tell -- I first came to understand, I  
 12 believe -- there was a -- the -- the teachers talk.  
 13 Let me just put it that way. And so that's how I  
 14 believe it was brought to my attention.  
 15 Q Would this have been after Ms. Eller  
 16 began working --  
 17 A Yes.  
 18 Q -- at the school?  
 19 A Yes.  
 20 Q And what did the teachers say?  
 21 A I mean, I heard through the -- that --  
 22 that she was once a man, you know.

10:25:01 1 And my thing is she's Ms. Eller. She's  
 2 here to teach. And I mean that when I say that. I  
 3 want my teachers to be there to teach my students,  
 4 period.  
 5 So I never brought it -- I never say  
 6 anything to her about it or anything of that nature  
 7 because Ms. Eller teach her students. That's all.  
 8 Q If a teacher brought this to your  
 9 attention, did you say anything to them about --  
 10 A No. I think it was my -- I think it was  
 11 my assistant principal who had -- who said that to  
 12 me. And I can't recall exactly verbatim, but I'm  
 13 sure I said, "Look. She's here to teach." And  
 14 that's my mind-set.  
 15 And I don't -- you know, I don't  
 16 entertain the teachers' rumors. I don't get into  
 17 all of that nonsense. That's -- I don't get with  
 18 that at all; so -- we're here to teach. I'm very  
 19 firm when it comes to that.  
 20 Q Understood.  
 21 So do you remember giving any guidance to  
 22 Mr. Connelin on what he should say to teachers if

10:26:13 1 they raised this issue?  
 2 A She's here to teach, period.  
 3 Q Do you recall meeting at some point  
 4 around the time Ms. Eller began teaching at  
 5 James Madison with a local pastor?  
 6 A Yes. A parent. Uh-huh.  
 7 I don't recall the child's name, but it  
 8 was a parent who came. Uh-huh.  
 9 Q And this parent is also a pastor locally?  
 10 A Yes.  
 11 Q Do you know the church the pastor was  
 12 affiliated with?  
 13 A I don't. I don't.  
 14 Q And did the -- this parent, did they  
 15 communicate with you in writing to set up a meeting  
 16 to talk to you?  
 17 A No, because I have an open-door policy.  
 18 So the parent just came in. And I know it was right  
 19 before Back to School Night. So it was the  
 20 beginning of the school year. So probably like the  
 21 second week of school because I know it was before  
 22 Back to School Night.

10:27:16 1 Q So that would have been early  
 2 September 2016?  
 3 A Yes. Uh-huh.  
 4 Q And can you describe the conversation  
 5 with this parent?  
 6 A The parent was concerned. He heard that  
 7 Ms. Eller was transgender, and he had concerns.  
 8 And, again, I said to that parent, "Our teachers are  
 9 here to teach."  
 10 And Ms. Eller was doing a great job  
 11 teaching. She knew her content. You know, I knew  
 12 she had the high school experience as well, which  
 13 was good because her class was a cotaught class. So  
 14 I had a general educator, which was Ms. Eller, and  
 15 then I had a special educator. I forgot who it was.  
 16 And so she knew that content.  
 17 So -- and I said to the parent, "She's  
 18 here, she's teaching, and she's doing a phenomenal  
 19 job."  
 20 And I even -- like I always -- with  
 21 parents who have any concerns with teachers, "Why  
 22 don't you come into the class and see this person

10:28:11 1 teaching?"  
 2 I don't think the parent took me up on  
 3 it. But that was -- that was the basis of the  
 4 conversation. Uh-huh.  
 5 And that was the only parent. And I have  
 6 a very verbal community. And that was the only  
 7 parent who had -- who came to us with a concern.  
 8 Uh-huh.  
 9 Q Did you report this meeting to anyone?  
 10 A I didn't -- I may -- I don't -- I may  
 11 have -- I may have -- I may have shared it with  
 12 Susan, Ms. Holiday. But I did no official -- uh-uh.  
 13 Q And did you tell Ms. Eller about this  
 14 meeting?  
 15 A I didn't. I don't -- I don't -- as I  
 16 recall, I didn't. I didn't, because I didn't --  
 17 like I said, I never really even addressed that with  
 18 her. You know what I'm saying? Because I wanted  
 19 her to be -- I want her to -- "Hey, listen. I don't  
 20 know what happened. Clean start. Come here, teach.  
 21 We're going to treat you with respect."  
 22 So I didn't want that to hinder her or

10:29:15 1 make her feel a certain kind of way. So if -- maybe  
 2 if the parent had maybe progressed from that  
 3 conversation, which he didn't, you know, the  
 4 conversation with her would have been necessary,  
 5 But I didn't. Uh-uh.  
 6 Q And so this parent spoke to you one time,  
 7 and that was the only --  
 8 A That was it.  
 9 Q -- time you spoke to her?  
 10 A Uh-huh.  
 11 Q Okay. And you don't recall speaking with  
 12 anyone from Friendly High School regarding  
 13 Ms. Eller?  
 14 A No.  
 15 Q Okay.  
 16 A Uh-uh.  
 17 Q Did anyone at the school system provide  
 18 you with any advice about how to relate to people  
 19 who are a transgender before Ms. Eller joined  
 20 James Madison?  
 21 A Not that I recall. I know equity is a --  
 22 was a -- is a huge piece, you know; so -- always be

10:30:07 1 equitable across the board with all of your  
 2 employees. Uh-huh.  
 3 Q And you weren't given any written  
 4 materials before Ms. Eller joined related to gender  
 5 identity?  
 6 A Not that I recall, no.  
 7 Q When you learned that Ms. Eller was  
 8 transgender --  
 9 A Uh-huh.  
 10 Q -- did you ask anyone for advice about  
 11 how to be inclusive of people who are transgender in  
 12 the workplace?  
 13 A I didn't. Uh-uh.  
 14 Q Had you ever worked with anyone who you  
 15 knew to be transgender before Ms. Eller?  
 16 A No.  
 17 Q And how about since Ms. Eller worked at  
 18 James Madison?  
 19 A No. No one. Uh-uh.  
 20 Q How about students? Were you aware of  
 21 any students who identified as transgender during  
 22 your time as principal of James Madison?

10:31:03 1 A No.  
 2 Q Okay. How about before James Madison  
 3 when you were an assistant principal?  
 4 A No. Uh-uh.  
 5 Q When Ms. Eller began working at  
 6 James Madison, I understand there was an issue with  
 7 her being on the payroll of another school.  
 8 Do you remember that?  
 9 A I don't. But it's -- it could be -- it's  
 10 not uncommon. Sometimes the paperwork and all in  
 11 the human resources and payroll as far as -- yeah, I  
 12 don't recall it. But that's not uncommon if it's --  
 13 Q That's what I was going to ask.  
 14 When a teacher starts, is it common for  
 15 teachers to be on the wrong payroll?  
 16 A Yeah. I mean, that's -- yeah. Not --  
 17 that's just -- someone needs to go into the system  
 18 and make the change. And that's from our  
 19 maintenance -- I've had maintenance crew workers who  
 20 have been transferred from other schools and they  
 21 were still on another payroll; so -- yeah.  
 22 Q Okay. Great.

00:52:03 1 So we're going to talk for a few minutes  
 2 about training.  
 3 A Okay.  
 4 Q So when you were a teacher at Prince  
 5 George's Public County Schools, did the county  
 6 provide you with training?  
 7 A Regarding?  
 8 Q Just -- first, what kind of training?  
 9 A Oh, yes. Professional development. Our  
 10 county -- we give a lot of professional development;  
 11 so -- yes.  
 12 During that time, I was an English  
 13 teacher. So, of course, my content matter. Of  
 14 course, my -- beginning of my school year, you get  
 15 training with some of the aspects with pedagogy as  
 16 far as actually learning how to teach and the Castle  
 17 management, time management, recordkeeping, grading,  
 18 things of that nature; so, yeah.  
 19 But it was more so based around the  
 20 content, the instructional side, as far as our  
 21 professional development.  
 22 Q Did you ever receive any training

10:33:06 1 concerning how to interact with a diverse student  
 2 body?  
 3 A Yes, because Parkdale -- especially -- at  
 4 Parkdale, we have a very diverse student body.  
 5 Uh-huh.  
 6 Q And did any of that training discuss  
 7 students who are lesbian, gay, bisexual, or  
 8 transgender?  
 9 A Back then, no. It was really more so  
 10 with culture at -- you know what I'm saying? -- than  
 11 on gender.  
 12 Q Was there any training about how to  
 13 interact with diverse coworkers?  
 14 A Yes. Uh-huh.  
 15 Q And how about that? Did any of that  
 16 training discuss lesbian, gay, bisexual, or  
 17 transgender coworkers?  
 18 A I'm not saying it didn't, but I don't --  
 19 I don't recall.  
 20 Q How about when you were an assistant  
 21 principal?  
 22 A Uh-huh.

10:33:56 1 Q Did you receive training in that role  
 2 from the county?  
 3 A As far as -- again, equity. So, you  
 4 know, in all aspects as far as treating people  
 5 equitable, all categories was covered.  
 6 I can't, like -- it's so many years ago.  
 7 But I would not -- I would not say, no, they didn't  
 8 have -- included the gender piece. But I know  
 9 equity across the board is really big. Uh-huh.  
 10 Q Do you recall any training -- this is  
 11 before you were principal of James Madison -- that  
 12 covered transgender students or students who were  
 13 questioning their gender identity?  
 14 A Yes. And I recall a -- I recall a --  
 15 during the prom we had a student. And the question  
 16 came up whether or not the student -- I don't -- I  
 17 think it was something about the student wanted to  
 18 wear a tuxedo. I think a young lady wanted to wear  
 19 a tuxedo.  
 20 We were like, "Okay. Fine. That's what  
 21 she wants to wear," you know. She -- because that  
 22 was back in the '90s -- you know, like '90s, early

10:35:11 1 2000s. And so that was the only time.  
 2 And so I remember that conversation came  
 3 up. And I -- one time -- equity. Everyone -- I  
 4 mean, they have that right, to be treated fairly.  
 5 She wants to wear a tuxedo, let her wear a tuxedo.  
 6 I do recall that time, yeah.  
 7 Q Okay. So that was an incident --  
 8 A That was an incident.  
 9 Q -- where -- excuse me -- that was an  
 10 instance where the student wanted to wear a tuxedo  
 11 to the prom and --  
 12 A And it was a girl.  
 13 Q Okay.  
 14 A Right.  
 15 Q -- your principal said that was fine?  
 16 A Yes. Uh-huh.  
 17 Q Was there any training that was given to  
 18 teachers or other staff members around that  
 19 instance?  
 20 A The training dealt with the equity. And  
 21 that was -- that's always been a big thing in our  
 22 county is equity. That just covers all bases. You

10:35:57 1 I have to treat people fairly across the board.  
 2 Uh-huh.  
 3 Q But you don't recall any specific  
 4 training that discussed gender identity?  
 5 A No. Not just, like, gender, no.  
 6 Q Can you describe training that talked  
 7 about equity? What -- what was the content of that  
 8 training? What did it look like?  
 9 Do you remember any details about that  
 10 training?  
 11 A Not -- not -- as far as, like, who  
 12 presented and all that, I don't. But as far as the  
 13 content. Just -- you know, just being fair across  
 14 the board and -- you know, with the students -- with  
 15 the students, you know, going by our administrative  
 16 procedures that we have in place. With our faculty,  
 17 being fair across the board. Not having any  
 18 biases -- you know what I'm saying? -- towards the  
 19 individual, you know; so -- uh-huh.  
 20 And we made it professional. Uh-huh.  
 21 Q So how about since you've been principal  
 22 of James Madison? Have you received training, you

10:37:39 1 I know, again, about -- let's start with sexual  
 2 orientation.  
 3 A Sexual orientation -- like, just on  
 4 sexual orientation, I don't recall. But, again,  
 5 dealing with equity and biases.  
 6 I know we're getting training even --  
 7 just as -- more -- like, this year, dealing with  
 8 biases and making sure. And, I mean, it was an  
 9 eye-opening, you know, just as far as we had -- you  
 10 had to really make sure, as professionals, you do  
 11 not allow your personal bias stand in -- decisions  
 12 that you are making. Uh-huh.  
 13 Q So within this training that talked about  
 14 biases, can you remember, were there examples that  
 15 used sexual orientation or gender identity?  
 16 A I don't recall, but it could -- it could  
 17 have been, though, because this was very -- this was  
 18 recent. This was the summer of last year.  
 19 Q Okay. Do you recall any equity training  
 20 prior to the fall of 2016 that related to -- or used  
 21 examples of sexual orientation, gender identity,  
 22 persons who identify as transgender?

10:38:32 1 A I don't recall. But like I said, I would  
 2 not -- I wouldn't be surprised. I won't dismiss it.  
 3 I'm not saying it wasn't there. I just don't  
 4 remember.  
 5 I just -- I just -- again, my -- the way  
 6 I look at it, sir, is I just look at equity across  
 7 the board; so -- I'm not saying it wasn't there. I  
 8 just don't remember.  
 9 Q As a principal, did you ever request  
 10 specific training of any kind for your faculty from  
 11 the county?  
 12 A On gender biases?  
 13 Q Well, let's just start in general.  
 14 Did you ever have a time when you asked  
 15 the county for a specific training because there was  
 16 an issue at your school that you thought needed to  
 17 be addressed?  
 18 A No.  
 19 Q How about not asking the county but just  
 20 as principal, did you ever arrange any special  
 21 trainings for your faculty around issues that you  
 22 thought needed to be addressed?

10:39:21 1 A Oh, yes. Uh-huh.  
 2 Q Can you give us some examples of the  
 3 kinds of training you might bring in?  
 4 A Confidentiality, how to communicate with  
 5 parents. Of course, things dealing with classroom  
 6 management, dealing -- things dealing with  
 7 instruction, subject content. And then, of course,  
 8 we always have to go over our various trainings as  
 9 far as child abuse, neglect, homelessness, those  
 10 different type of topics.  
 11 Q So --  
 12 A Uh-huh.  
 13 Q -- do you have discretion to schedule  
 14 your own trainings for faculty, or do you have to  
 15 work with your ID to get those approved?  
 16 A It's a hybrid. You know, there is times  
 17 when they're like, "You will have to" -- "this is a  
 18 professional development day. This has to be  
 19 covered."  
 20 And then you usually for professional  
 21 development day, they'll give us things we have to  
 22 cover. And then they'll give us some autonomy of,

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10:40:30 1 you know, other things we can do.  
 2 Q How about student assemblies? Do you  
 3 have discretion to schedule those?  
 4 A Oh, sure.  
 5 Q Does the district ever require  
 6 assemblies?  
 7 A They may, but it's very rare. But, yes,  
 8 they have.  
 9 Q So you would say that, typically, you're  
 10 responsible for putting together student assemblies?  
 11 A Yes.  
 12 Q Do you have to get approval from the  
 13 district to have assemblies for students?  
 14 A No. Uh-uh.  
 15 Q And how often do you do assemblies with  
 16 the student body?  
 17 A Well, each quarter we have our students'  
 18 rights and responsibilities assembly, which  
 19 basically goes over the code of conduct, if you  
 20 will. And then we have assemblies such as Black  
 21 History Month assemblies. Our student government  
 22 association, when they have -- when our student SGA

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10:41:20 1 officers meet with the student ambassadors, they  
 2 have an assembly.  
 3 We've had -- on various topics. But as  
 4 far as consistently definitely, our student code of  
 5 conduct, our Black History, you know, our winter  
 6 concert, honor roll assemblies, you know,  
 7 end-of-the-quarter assemblies where we honor and  
 8 celebrate those for improvement, academic  
 9 improvement, things of that nature.  
 10 Q And how about assemblies around diversity  
 11 and inclusion?  
 12 A We hadn't -- we didn't have one -- we had  
 13 one on bullying before. But we did not -- I  
 14 can't -- I don't know if we have one on diversity.  
 15 But within our -- yeah, I don't think we have one on  
 16 that.  
 17 Q How about -- this assembly on bullying,  
 18 do you remember when that was?  
 19 A Oh, my gracious.  
 20 Maybe about three years ago.  
 21 Q Do you think the assembly about bullying  
 22 would have been --

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10:42:00 1 A We had more than one, though. I -- yeah.  
 2 Q Okay. Sorry.  
 3 Do you think the assembly about bullying  
 4 would have been after fall of 2016?  
 5 A If so, it probably wasn't in the time  
 6 period Ms. Eller was there. Because the time period  
 7 Ms. Eller -- that's like right in the beginning of  
 8 the school year; so -- September, October, you just  
 9 setting the foundation, you know. I would have had  
 10 the student code of conduct assembly during that  
 11 period.  
 12 But assemblies such as those probably  
 13 wouldn't happen until after October, because it's  
 14 right -- that's right in the beginning of the --  
 15 that's early in the school year.  
 16 Q And what -- what did the assembly on  
 17 bullying look like? What was the message?  
 18 A Saying no to bullying. And we had  
 19 students perform poetries. It was very  
 20 student-based. And it was -- one of the ones I'm  
 21 remembering, it was led by some of our special ed  
 22 students, and -- which was -- and so then we had --

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10:43:42 1 I believe we had a video. We have poetry readings.  
 2 I think we had someone who spoke about being bullied  
 3 before. You know, like that.  
 4 Q Was anyone at the bullying assembly --  
 5 were they from the outside?  
 6 A No.  
 7 Q Okay.  
 8 A Uh-uh. It was school.  
 9 Q And do you remember whether this bullying  
 10 assembly addressed issues of discrimination?  
 11 A I can't remember, because like I say, it  
 12 was really student -- student -- I don't -- yeah. I  
 13 can't remember.  
 14 Q Do you remember any assembly for the  
 15 students that would ever address diversity inclusion  
 16 for specifically lesbian, gay, bisexual, or  
 17 transgender individuals?  
 18 A No.  
 19 Q Okay.  
 20 A I don't recall it.  
 21 Q Okay. I'm going to show you a document.  
 22 MR. MCSORLEY: We're starting at 50.

10:44:53 1 (King Deposition Exhibit 50 was marked  
 2 for identification and attached to the transcript.)  
 3 BY MR. McSORLEY:  
 4 Q If you could take a minute to look at  
 5 this email from August 2016.  
 6 A Uh-huh.  
 7 Q Would you agree this is an email you sent  
 8 regarding mandatory training for faculty and staff?  
 9 A Yes.  
 10 Q Do you remember sending this email?  
 11 A I -- I mean, that technically -- I mean,  
 12 yeah. I mean, it's from me.  
 13 Q And why did you send this email out?  
 14 A Because as you saw and we talked about, I  
 15 think I shared with you before some of the mandated  
 16 training. These are mandated trainings that the  
 17 county -- that the county mandates for everyone  
 18 to -- to do. Uh-huh.  
 19 Q So who would have created this list of  
 20 mandated trainings?  
 21 A That -- I don't -- I don't know. It's  
 22 from above. Central office. I'll put it that way.

10:45:50 1 Q Understood.  
 2 A Central office. Uh-huh.  
 3 Q And is there a written policy that you  
 4 have about what trainings are mandatory?  
 5 A Yes. They will receive a memo or  
 6 something from the county saying these are the  
 7 required trainings. Uh-huh.  
 8 Q So you would have received some kind of  
 9 communication from the county telling you what  
 10 trainings were mandatory, and that's what you were  
 11 passing along here?  
 12 A Yes. Uh-huh.  
 13 Q Have you taken the trainings that are in  
 14 this list?  
 15 A Oh, yes.  
 16 Q And how does that work? Are they in  
 17 person?  
 18 A Well, I can't remember. In 2016 I think  
 19 they were on videos. I think they're -- because  
 20 now -- I know for now we have videos that we  
 21 actually go on. I believe these are videos.  
 22 Uh-huh.

10:46:43 1 But you had to answer questions. I know  
 2 you had to answer questions. Like, you had  
 3 assessments for each one, and you had to pass.  
 4 Uh-huh.  
 5 Q And who would have created these videos?  
 6 A Central office. I don't know.  
 7 Q So do you remember -- I mean, you've  
 8 watched these individuals since 2016 --  
 9 A Uh-huh.  
 10 Q -- or -- do you remember the beginning of  
 11 the video there being any kind of title page that  
 12 tells you who recorded the video or when it was  
 13 recorded?  
 14 A No. Like, for the videos we watch now is  
 15 under the -- they're called SafeSchools.  
 16 SafeSchools videos, I think. So I'm not quite sure.  
 17 Q Would you say the videos look like they  
 18 were produced by the county?  
 19 A No. I think it's more an outside vendor.  
 20 I don't know that, but I don't think so.  
 21 Q And you think the outside vendor may be  
 22 called SafeSchools?

10:47:49 1 A I know that's -- that's the link we go  
 2 on. It's called Safe- -- SafeSchool videos.  
 3 Q Okay. And just going through the list  
 4 that's in the email, what is the content of  
 5 blood-borne pathogen about?  
 6 A That talks about -- say, for instance, if  
 7 a student has a nosebleed in the classroom, there's  
 8 blood on the desk, there's blood -- what are you  
 9 supposed to do? You know, of course, not touching  
 10 it; keep the children away; call for, of course, the  
 11 nurse, maintenance. How maintenance have to come  
 12 with particular chemicals to clean. And then all  
 13 teachers are given gloves and, you know, things of  
 14 that nature. So that's what that deals with.  
 15 Q Understood.  
 16 How about the bullying and harassment  
 17 training?  
 18 A It was for, if my memory serves me  
 19 correctly, bullying with students as well as  
 20 faculty-to-faculty bullying and harassment; so --  
 21 yeah.  
 22 Q Do you remember whether that video

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10:45:51 1 includes a discussion of bullying and harassment  
 2 related to lesbian, gay, transgender, and bisexual  
 3 individuals?  
 4 A I can't recall. I don't recall, but it  
 5 may be.  
 6 Q And does the video offer guidelines on  
 7 what a faculty member is supposed to do where there  
 8 is bullying?  
 9 A Uh-huh. Yes.  
 10 Q Does it provide specific steps you're  
 11 supposed to take when a student is bullying?  
 12 A Yes.  
 13 Q And what are some of those steps that you  
 14 can remember?  
 15 A Well, we have -- in our county, we have  
 16 an actual bully -- a Bullying and Harassment  
 17 Reporting Form; right? So if you suspect or you  
 18 feel that's going on, you complete that form. And  
 19 then, in turn, the form is given to our -- to the  
 20 in-house school security. An investigation is  
 21 conducted.  
 22 Q And is that when a student is being

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10:49:55 1 bullied?  
 2 A A student or even faculty. Uh-huh.  
 3 Q Okay. So this --  
 4 A Now, as far as if it's a faculty, then it  
 5 wouldn't -- it wouldn't be the schoolhouse security  
 6 investigating. Or like if someone came to me and  
 7 said it was a faculty, then more like I will call  
 8 the central security. It wouldn't be -- so the  
 9 students are in-house security. But if it was  
 10 something with faculty, then I will call central.  
 11 Uh-huh. So it would be -- you know, it would be  
 12 unbiased. It wouldn't be someone in-house  
 13 investigating. Uh-huh.  
 14 Q So how often have you filed -- have you  
 15 filed one of these harassment forms since you've  
 16 been a principal at James Madison?  
 17 A Have I submitted one? No.  
 18 Q Who is responsible for submitting the  
 19 harassment forms?  
 20 A Whoever the person -- the victim.  
 21 Q Okay.  
 22 A So someone feels as though they're being

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10:54:00 1 bullied.  
 2 Q So is there a requirement or -- is there  
 3 a requirement that, if someone else witnesses  
 4 bullying, they should file a harassment form?  
 5 A Well, on the form, it asks you to list  
 6 witnesses. So during the investigation, then those  
 7 witnesses will be contacted.  
 8 Q Okay. So the harassment form is supposed  
 9 to be used only by the victim?  
 10 A Right. Or like -- like in the case where  
 11 a student -- a lot of times, the parents will fill  
 12 it out. Uh-huh.  
 13 Q Okay.  
 14 A I've never had a situation where a  
 15 teacher came to me and said it was another teacher  
 16 harassing them. So I don't -- I'm -- I believe what  
 17 I'm saying is correct -- right.  
 18 Q Have you ever had a situation where a  
 19 harassment form was filled out where a teacher  
 20 indicated they were being harassed by a student?  
 21 A No. You -- no. I -- no. Not -- uh-uh.  
 22 Uh-uh.

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10:51:59 1 Q How often are harassment forms filed at  
 2 the school?  
 3 A It varies. I mean -- and most -- because  
 4 it really is with the students; right? And so -- I  
 5 mean, I'm more -- I don't -- really haven't had  
 6 harassment, because it's a bully and harassment  
 7 form.  
 8 So, really, when we get the forms, it's  
 9 because the parent feels as though their child is  
 10 being bullied more than the harassment.  
 11 Q So over the past year, do you recall  
 12 there being any harassment form filed related to  
 13 harassment?  
 14 A No.  
 15 Q Okay. Do you recall any harassment form  
 16 related to harassment filed since you've been a  
 17 principal at James Madison?  
 18 A No. It's always really been about  
 19 bullying.  
 20 Q Does the bullying and harassment form ask  
 21 specifically about kinds of harassment?  
 22 A I don't think so. I think there's a

10:53:07 1 place there where -- you know, describe the  
 2 incident.  
 3 Q Okay. So there aren't check boxes on the  
 4 harassment form?  
 5 A I don't think so. I can't -- I don't  
 6 recall.  
 7 Q Okay.  
 8 A Uh-huh.  
 9 Q Okay. Let's talk about the next training  
 10 on the email in Plaintiff's 50. There is a training  
 11 related to homelessness.  
 12 A Yes.  
 13 Q What is the nature of that training?  
 14 A It just basically give you an  
 15 understanding, because our students who are  
 16 homeless, they -- many of the times they live  
 17 outside the boundary. All right? So it talks  
 18 about, you know, they maybe live outside the  
 19 boundary, but public -- our transportation -- public  
 20 transportation -- school transportation is still  
 21 offered to them.  
 22 Let's say, for instance, if there's a

10:53:54 1 field trip -- right? -- we have -- we need to at  
 2 least try to be able to -- they may not be able to  
 3 afford all the field trips; so the school at least  
 4 provides one field trip they'll offer to that child.  
 5 But just -- basically, just the technical  
 6 logistics surrounding that, you know, that a child  
 7 is -- oh, like, I have some children who live in  
 8 DC -- right? -- who -- who are -- who go to my  
 9 school, but they are deemed as homeless. And it's  
 10 treating them -- treating them fairly. Yeah. So --  
 11 Q And then moving down the list of  
 12 trainings, how about the training on sexual  
 13 harassment? What is that about?  
 14 A That -- that one -- if my memory serves  
 15 me correct, that was really dealing with -- within  
 16 the workplace as far as adults or -- adult, you  
 17 know. And, you know, what that looks like, you  
 18 know. You know, how sexual harassment is just not  
 19 touching physically, but it could also be a verbal,  
 20 you know. How a one-time offense can warrant sexual  
 21 harassment.  
 22 It doesn't have to be like it has to be a

10:55:00 1 litany -- all right? -- of incidents. One time can  
 2 be considered as a sexual harassment.  
 3 Q Do you remember whether that video  
 4 specifically addresses, for example, sexual  
 5 orientation? So harassment between people of the  
 6 same gender.  
 7 A I don't recall.  
 8 Q And how about gender identity?  
 9 A I don't recall.  
 10 Q And then finally, the last training on  
 11 this list is reporting child abuse.  
 12 A Uh-huh.  
 13 Q What's the nature of that training?  
 14 A So that's basically making sure that all  
 15 employees understand that they are required -- even  
 16 if you suspect it, you are required to report  
 17 suspicion of child abuse. And then the different  
 18 types. Even if it's just physical, emotional, or  
 19 verbal. Or even neglect.  
 20 You know, if you see -- you have a  
 21 student coming in, you know, the clothes are -- you  
 22 know, wearing the same things or dirty. Or if you

10:56:00 1 don't have, you know, food or different things of  
 2 that nature, looking unkempt, then it's your  
 3 responsibility. You don't have a choice, basically.  
 4 So it just talks about -- and it talks about the  
 5 legalities of it if you do not report. Uh-huh.  
 6 Q Have you sent similar training reminder  
 7 emails for the -- strike that.  
 8 This email was from 2016. Do you  
 9 remember whether you sent a similar training email  
 10 in 2017?  
 11 A I'm sure, because we do it each year.  
 12 Q So you would say that you've sent one for  
 13 each year, 2016, 2017, 2018, and 2019?  
 14 A Uh-huh.  
 15 Q Do you remember whether the list has  
 16 changed since 2016?  
 17 A Well, now -- now it's not a list, because  
 18 now you go on Safe- -- now you go onto Safe- --  
 19 SafeSchools videos. And so there's a whole list of  
 20 what's required for you -- for you to do.  
 21 So you don't even have -- so now my email  
 22 said make sure you go to SafeSchools online to

10:57:06 1 complete, because they give you different due dates.  
 2 When you go on that site, you see a whole list of  
 3 everything that you -- that's mandatory that you  
 4 have to take with the due date. So I don't have to  
 5 do a list. I just say go to the site.

6 Q So do you recall whether the current list  
 7 has any trainings that deal specifically with  
 8 diversity and inclusion?

9 A I want to say -- I can't remember. I  
 10 don't know if I can go on there or not. But I want  
 11 to say it's -- I think it's some with diversity.  
 12 I'm not quite sure.

13 Q Okay. And do you recall whether any of  
 14 the trainings, whatever they're about, if they  
 15 address issues of sexual orientation?

16 A I can't -- I don't recall.

17 Q And how about whether they address issues  
 18 of gender identity?

19 A I don't recall.

20 Q And how about whether they address issues  
 21 of how to be inclusive of people who identify as  
 22 transgender?

10:58:13 1 A I don't recall. Uh-uh.

2 Q Okay. Do you recall that Ms. Eller may  
 3 have approached you about having a diversity  
 4 training for the students at James Madison?

5 A I do. Uh-huh. She wanted -- she  
 6 recommended an assembly. Uh-huh.

7 Q And what kind of assembly did she  
 8 recommend?

9 A Assembly for students to have an  
 10 understanding and -- of -- of our gender -- of  
 11 transgender and -- yeah. Uh-huh.

12 Q Okay. And were you supportive of this  
 13 idea?

14 A I was. I told her -- when she came to  
 15 me -- again, that was the beginning of the school  
 16 year. I told her I would think about it. I said,  
 17 "But it will probably have to be down" -- "down the  
 18 line maybe within the school year if we did  
 19 something like that. But not right" -- because  
 20 the -- again, that time of the school year, you have  
 21 to get order and make -- you know; so -- yeah.

22 But I wasn't -- I wasn't opposed to it.

10:59:10 1 And no one ever approached me and asked me about it.  
 2 Uh-huh.

3 Q Okay. So Ms. Eller approached you early  
 4 in the school year and asked you about this in a  
 5 conversation?

6 A Yeah. Because it was after -- after an  
 7 incident. I think a student had called her  
 8 Mr. Eller in the hallway or something, and so she  
 9 came -- I think she first went to Mr. Cornelin. So  
 10 I don't know if she wrote it up on a PS-74 or not.  
 11 I don't think so. I don't know.

12 But she told Mr. Cornelin. And then she  
 13 shared it with me, that a student had called her  
 14 Mr. Eller and all. And I believe it identified the  
 15 student. And Mr. Cornelin met with the student and  
 16 had a conversation with the student. And that's  
 17 when she had suggested.

18 And then middle school -- middle school  
 19 is a very -- they're stuck in the middle; right? So  
 20 those type of -- those type of issues, they're very  
 21 relevant. But you have to be very careful on how  
 22 you're going to present it.

11:00:08 1 So when she told me, I said that's a good  
 2 idea, but I had to really think that through of how  
 3 to have that type of assembly with that age group,  
 4 because it could be beneficial, but then it could  
 5 also turn on you, the way you present it with that,  
 6 because they're not -- that maturity level for some  
 7 of them. I didn't know if we would be ready for  
 8 that; so I had to really think that through, how to  
 9 present that to that age.

10 High school, yeah. But middle school,  
 11 you have to -- yeah.

12 Q That makes sense.

13 Can you sort of talk a little bit more  
 14 about that concern. What was your concern about the  
 15 possible negative consequences of that --

16 A Because middle --

17 Q -- kind of assembly?

18 A -- school, that adolescent stage, they  
 19 like to tease a lot, you know. And sometimes  
 20 they'll take information and just roll with -- and  
 21 misconstrue it and just so -- but it can be done.  
 22 But you definitely just have to be very mindful of

11:01:08 1 how you present it so they will be -- more so they  
 2 become sensitive to it, you know, and not take it  
 3 and think it's funny -- you know what I'm saying? --  
 4 and tease someone or something of that nature.  
 5           So you have to just be careful with that  
 6 age group. I don't know if that makes sense or not.  
 7 But, you know, 12- and 13-year-olds --  
 8           Q No. I understand.  
 9           A -- you have to be mindful. Yeah.  
 10          Q So you remember having one conversation  
 11 with Ms. Eller about this kind of assembly.  
 12          A Uh-huh.  
 13          Q Did you talk to her about this idea more  
 14 than once?  
 15          A I don't believe I talked to her more than  
 16 once. There's two conversations I remember having  
 17 with Ms. Eller -- I don't know if I can say this now  
 18 or not -- was that conversation and then the  
 19 conversation when she came and told me she was  
 20 leaving.  
 21          Q Okay.  
 22          A That was the conversation -- those were

11:01:59 1 the two that really stick out in my head. Uh-huh.  
 2           Q Okay. And we'll talk about that.  
 3           A Okay.  
 4           Q Let's just talk a little bit more about  
 5 this idea for training.  
 6           So Ms. Eller talked to you about possibly  
 7 having a training.  
 8           A Uh-huh.  
 9           Q Then you said -- you told her you like  
 10 the idea, but it would not work to have it at the  
 11 beginning of the year.  
 12          A Yeah. And not because of the nature of  
 13 the topic. Just -- I don't really have those type  
 14 assemblies in the beginning of the school year.  
 15           The beginning of the school year for  
 16 me -- I told you I'm a firm teacher -- firm  
 17 principal. The beginning is setting the foundation,  
 18 let my expectations be known and make sure you  
 19 understand; right?  
 20           So that's what we really do. That's why  
 21 I said the student code of conduct assembly, we have  
 22 it at the beginning of the school year; so -- you

11:02:42 1 know, really, our assemblies -- like, our first  
 2 assembly -- like, our honor roll assembly wouldn't  
 3 occur until November after the first quarter.  
 4           But that first quarter, we have our Back  
 5 to School Night, we have our student code of conduct  
 6 assemblies. But it's really giving the teachers an  
 7 opportunity to start learning their students,  
 8 establishing their needs and expectations in the  
 9 classroom before you go into an assembly, if you  
 10 understand what I'm saying.  
 11          Q Understood.  
 12           So did you talk to anyone else about this  
 13 idea, or was it kind of -- it was put on hold after  
 14 that first conversation?  
 15          A I can't -- I can't recall. I don't know  
 16 if I talked about it. If I would have, it probably  
 17 would have been my guidance chair, my guidance  
 18 counselor chair. But I don't remember. Uh-huh.  
 19          MR. McSORLEY: Do you want to take a  
 20 break?  
 21          MR. SHARMA: I do.  
 22          MR. McSORLEY: Oh, you do.

11:03:43 1           Oh, sure.  
 2           THE WITNESS: Okay.  
 3           (A recess was taken.)  
 4 BY MR. McSORLEY:  
 5           Q I'm going to turn to talking about  
 6 policies related to discipline.  
 7           So just, first, what kinds of  
 8 disciplinary measures are available for students at  
 9 James Madison?  
 10          A Our discipline policies are based on the  
 11 county's. During that time I think it was called  
 12 Student Code of Conduct. Now it's Students' Rights  
 13 and Responsibilities.  
 14           And within the Student Rights -- I may  
 15 simultaneously say "Student Code of Conduct,"  
 16 Students' Rights and Responsibilities." Is all the  
 17 same, basically -- they have -- they identify the  
 18 various types of infractions. And then along with  
 19 those infractions, they identify the level -- the  
 20 consequences. And the consequences are based on  
 21 levels. So you have level one, level two,  
 22 level three, level four, level five.

11:11:45 1 A level one, level two infraction may  
 2 warrant a telephone call to a parent; time out, if  
 3 you will; maybe in-school suspension. A level three  
 4 may warrant out-of-school suspension. Okay?  
 5 So let's say, for instance, fighting.  
 6 You know, like, a level one could be tardy --  
 7 unexcused tardy to class, loitering in the  
 8 hallway -- you know what I'm saying? -- or  
 9 name-calling, you know.  
 10 A level three could be, say, for  
 11 instance, a fighting. So a level three consequence  
 12 can be out-of-school suspension -- right? -- up to,  
 13 like, three to four days.  
 14 A level four is -- it can be for an  
 15 infraction that may warrant a long-term suspension.  
 16 A long-term suspension is anything five or above;  
 17 right? So it may be -- an example may be, say, for  
 18 instance, bringing marijuana to school, something of  
 19 that nature.  
 20 A level five offense is something that  
 21 can be actually expellable; right? So a weapon, a  
 22 gun, you know, a group fight that had, like, major

11:12:56 1 bodily harm. So in that case, you could put in the  
 2 consequence a request for expulsion.  
 3 So that's what we go by in the county.  
 4 Q That's a very helpful overview; so -- and  
 5 you've answered a lot of initial questions.  
 6 So I guess you said a level one  
 7 infraction could include, as a consequence, a phone  
 8 call to a parent?  
 9 A Uh-huh. Or even a conference with the  
 10 administrator. Uh-huh.  
 11 Q How about a -- do you put formal warnings  
 12 in student files?  
 13 A If -- if -- sometimes teachers do;  
 14 sometimes teachers don't. But we have something  
 15 that's called a PS-74 --  
 16 Q Okay.  
 17 A -- which is a disciplinary action form.  
 18 So if a teacher completes that,  
 19 they're -- on the form, they'll identify what the  
 20 incident is. So, say, you know, the child was using  
 21 profanity in the classroom, at the bottom of the  
 22 form, it talks -- it talks about how -- what actions

11:13:50 1 were taken. And that's completed by the assistant  
 2 principal.  
 3 So, you know, if you say warning was  
 4 issued, then you'll write that. Parent called, or  
 5 whatever; so you'll write that on that form.  
 6 Sometimes teachers complete the form;  
 7 sometimes they don't. Sometimes they'll just send  
 8 them directly to the office, and then we'll deal  
 9 with it then; so -- yeah.  
 10 Q So would there be a kind of infraction  
 11 below level one where the administration isn't  
 12 called?  
 13 A I mean, sometimes you have some things in  
 14 the classroom. The teacher -- I mean, the first  
 15 line of the defense -- or offense? defense? -- will  
 16 be the teacher based on if it's something that's  
 17 below a level one, you know.  
 18 Hey, you know, got out of their seat  
 19 without raising their hand. I would not expect for  
 20 you to be sending them to the administrator for  
 21 that. That's something the teacher can handle. So  
 22 I guess that could be considered below a level one.

11:14:47 1 Q I guess what I'm asking is level one is  
 2 the first level when your administration's involved?  
 3 A No. Level -- level one -- the levels  
 4 really dictate the nature of infraction.  
 5 Q Okay.  
 6 A Not the -- you know what I'm saying? So  
 7 usually administrators -- if it gets to a level one,  
 8 the administrator is usually notified within --  
 9 because only the administrator can give consequences  
 10 from level one to five.  
 11 Q Okay.  
 12 A You understand what I'm saying?  
 13 So the levels is not really about the --  
 14 it is, but it's really first on the infraction.  
 15 So say, for instance, I know if a teacher  
 16 say to me, "They was using profanity in the  
 17 classroom." I know that's a level one. That's how  
 18 I think of it.  
 19 So I already know I'm not suspending that  
 20 child because of that because I know that's a  
 21 level one infraction, if that makes sense.  
 22 Q That makes sense.

11:15:38 1 Let me just clarify a little bit more.  
 2 So if a student uses one word of  
 3 profanity in the classroom and the teacher tells  
 4 them to stop, is that a level one offense?  
 5 A I guess it could be, because, really -- I  
 6 guess I'm -- from the perspective I'm looking at it  
 7 from is if they bring it to the administrator,  
 8 because that's when we really start going into the  
 9 consequence for a level one.  
 10 Q Okay.  
 11 A But, I mean, using profanity -- in the  
 12 Student Code of Conduct, this is level one, and they  
 13 did it in the classroom, it is a level one.  
 14 In this case, this teacher -- I'd have  
 15 some -- I have some teachers who will say -- I have  
 16 some teachers who will never send these students to  
 17 the administrator because they'll deal with it. So  
 18 that is a level one, yeah.  
 19 Q Okay. But you said only the  
 20 administrators can issue consequences.  
 21 A Consequences such as suspensions --  
 22 Q Okay.

11:17:24 1 about this a lot, but this is very helpful.  
 2 So for a level one, can you describe some  
 3 level one offenses?  
 4 A Are you talking about 2016? Because  
 5 things change.  
 6 Q Yes.  
 7 A So -- yeah. Like, you know, report --  
 8 you know -- you know, loitering. Loitering is one.  
 9 Like, you know, being late to class unexcused.  
 10 Maybe, like, name-calling, level one, level two.  
 11 MR. SHARMA: Are we able to just put the  
 12 Code of Conduct in front of her? Would that help?  
 13 MR. MCSORLEY: I think it's --  
 14 MR. SHARMA: I mean, the document speaks  
 15 for itself. The infractions are listed. The levels  
 16 are listed.  
 17 MR. MCSORLEY: I think it's helpful to  
 18 understand the way it was implemented at the school.  
 19 So we can just talk about it.  
 20 THE WITNESS: Okay.  
 21 BY MR. MCSORLEY:  
 22 Q So let's say a level one offense. So

11:16:18 1 A -- such as in-school suspension, like  
 2 that nature.  
 3 I mean, teachers have -- we want to  
 4 give -- we give teachers the liberty. There's  
 5 some -- I have some teachers who will say, you know,  
 6 "Ms. King, Johnny used the B word. I've already  
 7 called the parent. I had a parent conference  
 8 with" -- it's fine, you know; so -- yeah.  
 9 Q I was a high school teacher long ago;  
 10 so --  
 11 A Good job.  
 12 Q -- I understand.  
 13 A Good job. Yeah.  
 14 So -- so, yeah. So -- but as far as  
 15 suspensions, in-school suspensions -- really,  
 16 suspensions, in-school suspensions, those are --  
 17 only can come from the administrator.  
 18 Q Okay. Is there an after-school  
 19 detention?  
 20 A No, we don't have after-school detention.  
 21 We have in-school suspension.  
 22 Q Okay. So -- and I know we're talking

11:18:43 1 say -- you said name-calling. What were typical  
 2 consequences that you would have used in 2016, or  
 3 your vice principals?  
 4 A Warning, a parent call.  
 5 Q What about in-school suspension? When  
 6 would you have used that in 2016?  
 7 A Usually in-school suspension would be,  
 8 like, something if it's repeated, you know. It's  
 9 persistent that you're loitering in the building.  
 10 Yeah. Like, maybe warning three or four times, you  
 11 know, that's usually that -- you know, as far as  
 12 in-school suspension. Like a repeated level one or  
 13 two, you know. Uh-huh.  
 14 Q What about harassment of a teacher? What  
 15 level would that have been in 2016?  
 16 A I'm not quite sure. I'm not quite sure  
 17 of harassment.  
 18 Q I just -- hypothetically, if it was  
 19 reported to you that a student kept calling a female  
 20 teacher the B word, what would you anticipate the  
 21 consequences would have been?  
 22 MR. SHARMA: Objection.

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11:20:15 1 You can answer. You can answer.  
 2 THE WITNESS: What were the consequences?  
 3 If they kept calling the B word, definitely parent  
 4 conference with -- with the child and the teacher.  
 5 Definitely a parent -- and with my parents -- again,  
 6 my community -- you have a parent conference, that  
 7 usually -- that usually stops the situation.  
 8 So a parent -- I would definitely -- in a  
 9 situation like that, a parent conference. Uh-huh.  
 10 BY MR. MCSORLEY:  
 11 Q What about if a student used a racial  
 12 epithet towards a student or a teacher?  
 13 A Likewise. Because I also look at it as a  
 14 teachable moment. Again, that adolescent age. You  
 15 know what I'm saying? And then I also have to look  
 16 at the context of the whole situation, you know;  
 17 so -- but just -- all right. Offhand, just hearing  
 18 that, most definitely a  
 19 parent-teacher-administrative conference. Uh-huh.  
 20 Q Do you recall instances, since you've  
 21 been a principal at James Madison, where you've had  
 22 students use harassing or discriminatory language

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11:23:07 1 Someone who identifies as lesbian, gay, or bisexual?  
 2 A Uh-uh.  
 3 Q Okay. Do you recall if, in 2016, you  
 4 had, within the Code of Conduct, specific guidance  
 5 on how to address issues of discrimination?  
 6 A With our -- with our student code of  
 7 conduct assemblies, our administrator and our people  
 8 personnel worker conducts the assembly, and we  
 9 basically go through the code.  
 10 Q Okay.  
 11 A Go through the infractions and the levels  
 12 and the consequences. Uh-huh.  
 13 Q So I guess just to -- just to confirm,  
 14 you're not aware of a student disciplinary issue  
 15 involving discrimination?  
 16 A During that time? I don't -- no, I don't  
 17 recall discrimin- -- uh-uh.  
 18 Q Okay. Are you familiar with the term  
 19 "misgendering"?  
 20 A No.  
 21 Q Okay. So misgendering is a practice  
 22 where you refer to a person by a term, like a

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11:21:28 1 towards someone because of their race or ethnicity?  
 2 A Uh-uh. No.  
 3 A student toward teacher, you say?  
 4 Q Or another student.  
 5 A No. I'm not saying -- because I have an  
 6 assistant principal; so some things they may -- I  
 7 wouldn't have privy to. But nothing major, if you  
 8 would, that would come to my desk.  
 9 Q How about in terms of students using  
 10 discriminatory language about religion, someone's  
 11 religion?  
 12 A No, not that I know of. Uh-uh.  
 13 Q What about harassment by a student  
 14 towards a teacher or a student based on their sexual  
 15 orientation?  
 16 A That -- like I said, the one time when  
 17 Ms. Eller told me the student called her mister.  
 18 Q Just to clarify, that was -- that was an  
 19 incident where the student was using the wrong term  
 20 for her gender?  
 21 A Right.  
 22 Q Okay. But what about sexual orientation?

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11:24:40 1 pronoun, other than for the gender that they  
 2 identify.  
 3 A Okay.  
 4 Q So, for example, calling someone who  
 5 identifies as female by a male pronoun.  
 6 A Okay.  
 7 Q That would be misgendering.  
 8 A Okay.  
 9 Q Does that make sense?  
 10 A Yeah, I guess.  
 11 Q So were you aware that Ms. Eller was the  
 12 subject of misgendering by students while she was  
 13 teaching at James Madison?  
 14 A That one -- that incident she told me  
 15 about. Uh-huh.  
 16 Q So you recall only the one incident that  
 17 Ms. Eller reported?  
 18 A I believe so. It was that one incident.  
 19 I think -- if my memory serves me correctly, I think  
 20 there's one time she said she was walking to her car  
 21 and a child said something from the bus. But she  
 22 couldn't tell -- she didn't know who; so we weren't

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11:35:28 1 able to get that student. But I know the one in the  
2 hallway we were able to -- Mr. Connalin was able to  
3 address that issue.

4 But I believe she told me it was an  
5 incident where she was walking to the car and it  
6 occurred. But she didn't know -- because, you know,  
7 we have a whole line of buses in the afternoon. But  
8 she didn't know who it was.

9 Q So do you -- so you recall those two  
10 instances?

11 A Uh-huh.

12 Q Those are the only two instances that you  
13 remember of misgendering of Ms. Eller?

14 A Uh-huh.

15 Q Okay. Do you recall any time when you  
16 learned that Ms. Eller was misgendered by a teacher?

17 A No.

18 By a teacher? Uh-huh.

19 Q So --

20 A No.

21 Q -- do you remember about when you first  
22 became aware that Ms. Eller had been misgendered at

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11:36:34 1 James Madison?

2 A The first time -- it was with that  
3 incident with the boy in the hallway. I don't -- I  
4 don't know. I can't recall any that occurred,  
5 but -- yeah.

6 Q Okay. I'm going to show you an email,  
7 MR. MCSORLEY: This will be marked as  
8 Plaintiff's 51.

9 A Uh-huh.

10 (King Deposition Exhibit 51 was marked  
11 for identification and attached to the transcript.)

12 BY MR. MCSORLEY:

13 Q Have you had a chance to review the email  
14 from September 2016?

15 A I'm looking at it now.

16 Okay.

17 Q Okay. Am I correct in summarizing this  
18 email chain as describing follow-up from an incident  
19 where a student named [REDACTED] engaged in  
20 hostile misgendering towards Ms. Eller?

21 A That refer "her" to a "he"?

22 Q And in the email, if you see,

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11:38:00 1 Mr. Connalin states that he talked to the student  
2 along with you.

3 Do you see that?

4 A Yes.

5 Q Do you remember this discussion?

6 A I don't remember it, but -- I mean, I --  
7 I believe it could have happened, yeah.

8 Q Mr. Connalin says that he believed you  
9 contacted the student's parents with that -- do you  
10 recall talking to the student's parents?

11 A More than likely, a situation like this,  
12 the parents would have been made aware. Uh-huh.

13 Q And the email states that the student was  
14 given a warning.

15 Do you recall if any other disciplinary  
16 measures were considered?

17 A Well, disciplinary -- warning is a  
18 disciplinary measure, as well as calling the parents  
19 and informing the parents. Uh-huh.

20 Q Okay. Do you know if you considered  
21 taking any other action at this stage?

22 A I don't remember. I probably -- I can't

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11:39:08 1 remember the situation. But most likely I said if  
2 it had occurred again, or something of that nature,  
3 but -- yeah.

4 Q And do you -- now looking at this, do you  
5 remember whether there were any additional incidents  
6 where this particular student misgendered Ms. Eller?

7 A I don't recall.

8 Q Okay.

9 A I don't -- I don't think so. Like I  
10 said, I remember this incident and when she told me  
11 the incident about somebody on -- off the bus.

12 Q Okay. Thank you.

13 I'm going to show you another email.

14 A Okay.

15 MR. MCSORLEY: This will be marked as  
16 Plaintiff's 52.

17 (King Deposition Exhibit 52 was marked  
18 for identification and attached to the transcript.)

19 BY MR. MCSORLEY:

20 Q Okay. This email, would you agree, is  
21 from five days after the other email. So the other  
22 email was September 8<sup>th</sup>; this is September 13<sup>th</sup>.

11:59:43 1 And in it, Ms. Eller emailed you to say  
 2 that there was a situation she needed to discuss  
 3 with you.  
 4 A Uh-huh.  
 5 Q Do you remember what the situation she  
 6 was referring to was about?  
 7 A I don't know if this is the situation  
 8 about the -- about the bus. Like I said, those are  
 9 two that I recall. The one in the hallway and the  
 10 one on the bus, those are the two that stood out. I  
 11 don't -- yeah.  
 12 Q Okay. So she says she is encountering a  
 13 situation that could affect the learning  
 14 environment.  
 15 That doesn't ring any bells in terms of  
 16 what this situation may have been?  
 17 A No. I believe someone again called her  
 18 mister.  
 19 Q Okay.  
 20 A Uh-huh.  
 21 Q Do you remember if there was any  
 22 follow-up actions you took in response to the

11:01:44 1 discussion you had with her?  
 2 A No, because I had asked -- she told me  
 3 she couldn't tell -- identify -- if this is the  
 4 situation, couldn't identify the student regarding  
 5 that.  
 6 Q Do you know if this was a separate  
 7 incident from the one that was discussed five days  
 8 earlier where [REDACTED] misgendered Ms. Eller?  
 9 A Yes. The one from -- yeah. This -- if  
 10 this is the one I remember, it was the -- a bus  
 11 situation. So -- and I believe, if my memory serves  
 12 me correctly -- I really don't recall, to be honest  
 13 with you, as far as particulars. But I remember she  
 14 was like, "Something else happened. Someone else  
 15 has called me" -- "when I was walking to my car from  
 16 off the bus, someone said something."  
 17 Q Okay.  
 18 A It was -- you know. I believe it was  
 19 something like that.  
 20 Q So you believe this was a separate  
 21 incident?  
 22 A Right.

11:02:47 1 Q Okay. Okay.  
 2 All right. We're going to look at  
 3 another email.  
 4 A Okay.  
 5 MR. MCSORLEY: This is going to be marked  
 6 as Plaintiff's 53.  
 7 (Ring Deposition Exhibit 53 was marked  
 8 for identification and attached to the transcript.)  
 9 THE WITNESS: Okay.  
 10 BY MR. MCSORLEY:  
 11 Q Okay. So do you agree this is another  
 12 email from September 2016 -- this one from  
 13 September 26<sup>th</sup> -- in which Ms. Eller refers to an  
 14 act of misgendering by a student named  
 15 [REDACTED]  
 16 MR. SHARMA: Objection.  
 17 You can answer.  
 18 THE WITNESS: Yes.  
 19 BY MR. MCSORLEY:  
 20 Q Okay. Do you recall this incident?  
 21 A I don't. From -- it looks like  
 22 Mr. Connellin handled this situation.

11:03:12 1 Q So you see that Ms. Eller also emailed  
 2 you.  
 3 Do you know why she would have included  
 4 you on the email as well?  
 5 A I mean, sometimes teachers will do that,  
 6 include -- include me as well, but -- and then --  
 7 and we -- response -- Mr. Connellin said, "I will  
 8 speak to her."  
 9 So -- yeah. Yeah, he was the 8<sup>th</sup> grade  
 10 administrator; so he will handle it.  
 11 Q Did you ever talk to Mr. Connellin about  
 12 Ms. Eller?  
 13 A About?  
 14 Q Ms. Eller in connection with these  
 15 disciplinary incidents or treatment of Ms. Eller by  
 16 students.  
 17 A I'm sure I did. I'm sure we've had a  
 18 conversation.  
 19 Q Do you remember any specific  
 20 conversations with Mr. Connellin?  
 21 A I don't. But I -- I don't remember  
 22 specifically. But I know I will say, you know,

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11:35:16 1 "handle" -- like with anything else, you know,  
 2 name-calling, doing anything disrespectful, we  
 3 handle it like anything else across the board.  
 4 Q Okay. Did Mr. Connelin ever raise  
 5 concerns to you about Ms. Eller advocating on  
 6 campus?  
 7 A Advocating on campus?  
 8 No, not that I recall.  
 9 Q Okay.  
 10 A Advocating, uh-uh.  
 11 Advocating -- I mean, in what -- how?  
 12 Q Were you aware that Mr. Connelin has  
 13 advised Ms. Eller not to advocate on campus?  
 14 A No, I don't know about that.  
 15 Q Okay. Did you have concerns about  
 16 Ms. Eller advocating any issues on campus?  
 17 A No. She never did anything like that  
 18 that I know of.  
 19 Q Okay.  
 20 Okay. I think we'll look at another  
 21 email.  
 22 A Okay.

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11:38:39 1 she couldn't tell me -- she couldn't tell me which  
 2 bus it came from. She couldn't tell me -- because  
 3 in our afternoon dismissal we have a string of buses  
 4 where all the students come out. So it was  
 5 really -- virtually impossible to try to investigate  
 6 unless we went to every student on all the buses.  
 7 And she couldn't even -- yeah. So --  
 8 Q Understood.  
 9 So would you agree this is the email --  
 10 strike that.  
 11 Would you agree that this email from  
 12 October 5<sup>th</sup> from Ms. Eller is describing the  
 13 incident you remembered related to being screamed at  
 14 in the parking lot?  
 15 A Yes.  
 16 Q So, then, it's likely that the email  
 17 about the situation from the beginning of September  
 18 was not about that incident?  
 19 A Right.  
 20 Q Okay.  
 21 A But like I said, the two that stuck out  
 22 was the hallway and the bus. I don't remember

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11:36:56 1 MR. MCSORLEY: This will be  
 2 Plaintiff's 54.  
 3 (King Deposition Exhibit 54 was marked  
 4 for identification and attached to the transcript.)  
 5 BY MR. MCSORLEY:  
 6 Q If you could please read this email chain  
 7 from October 2016. It's a little bit longer.  
 8 A Okay. Uh-huh.  
 9 Q Okay. So if you turn to the first email  
 10 in the chain, which is from October 5<sup>th</sup> --  
 11 A Okay. This is the bus incident.  
 12 Q Yes.  
 13 So could you confirm that here Ms. Eller  
 14 is reporting to you about an incident where someone  
 15 screamed "Mr. Eller" to her -- "Mr. Eller" to her  
 16 while she was in the parking lot?  
 17 A Yes.  
 18 Q Okay. Did you identify who screamed  
 19 "Mr. Eller" at her?  
 20 A No.  
 21 Q Was there an investigation into that?  
 22 A That's what I asked her, and she told me

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11:39:40 1 anything else.  
 2 Q Okay. Let's look at the next email in  
 3 the chain. So the same page, just right above.  
 4 Would you agree this is an email between  
 5 you and Susan Holiday?  
 6 A Yes.  
 7 Q Do you remember why you emailed  
 8 Ms. Holiday about this incident?  
 9 A Because like I said earlier, sometimes  
 10 there were situations where, if I did not -- I felt  
 11 as though, okay, this is out of my -- I've done all  
 12 I can do as a principal. So then I will go to my  
 13 supervisor, who is my ID, to get some guidance,  
 14 because we've addressed the matter. I don't know  
 15 what else I need to do. Uh-huh. So that's what --  
 16 Q So in the email, you said: "We worked  
 17 hard to create an atmosphere of tolerance." What  
 18 did you mean by that?  
 19 A At times of being respectful of everyone,  
 20 of diversity, of being -- you know, of everyone.  
 21 You just -- I'm big on being -- our -- we have our  
 22 PBIS traits. And our PBIS traits for our school is

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11:40:48 1 caring, responsibility, and respectful. So being  
 2 respectful across the board.  
 3 Q Had you taken any specific steps that  
 4 fall -- to address Ms. Eller's gender identity with  
 5 the students?  
 6 A No.  
 7 Q Okay.  
 8 A No. Uh-uh.  
 9 Q And how about, more broadly, had you  
 10 addressed just the issue of respect for individuals  
 11 who are transgender with students?  
 12 A No.  
 13 Q Okay.  
 14 A Uh-uh.  
 15 Q Okay. And then you state that "In cases  
 16 where students demonstrated disrespect towards  
 17 Ms. Eller, we addressed the matter and issued  
 18 consequences."  
 19 A Uh-huh.  
 20 Q Have we discussed the consequences that  
 21 you remember issuing?  
 22 A Yeah. The warnings, the parent

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11:42:44 1 with the students, did you have any materials from  
 2 the school district that would have helped you with  
 3 that?  
 4 A If -- I would more likely have gone  
 5 outside of the -- of my local school into our  
 6 central office. Say, for instance, our people  
 7 personnel, our pupil services, you know, where they  
 8 have counselors, school psychologists, things of  
 9 that nature who could come and really talk. I would  
 10 want somewhat of an expert, if you will, to have  
 11 conversation with that regarding that.  
 12 Q And had you reached out to anyone at the  
 13 district about expertise in issues of gender  
 14 identity or transgender individuals?  
 15 A Before? No, I hadn't. Uh-uh.  
 16 Q Okay. Have you, at any time since you've  
 17 been with the school district, talked to people in  
 18 the central office about these issues?  
 19 A No. Uh-uh.  
 20 Q Okay. So in the next email in the chain,  
 21 Ms. Holiday says "Let me think this through." She's  
 22 not really sure.

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11:41:49 1 conferences.  
 2 Now, I'm unsure with the situation with  
 3 the young lady. I don't know what that consequence  
 4 was because I don't remember that one. But -- yeah.  
 5 Q Okay. And then the last sentence there  
 6 you say: "I don't know what more to do without  
 7 bringing the real issue to students which will only  
 8 escalate an issue."  
 9 What did you mean by that?  
 10 A I did not think they were ready right  
 11 then to -- as far as talk, like -- as you said,  
 12 having that conversation about transgender. You  
 13 know, saying that you -- they weren't ready for  
 14 that. Uh-uh.  
 15 Q And why did you think they weren't ready  
 16 for that?  
 17 A Because it's the beginning of the school  
 18 year. And, again, you have to learn your students,  
 19 understand where they are. And topics like that,  
 20 really get an understanding of how to -- to deliver  
 21 that with them.  
 22 Q If you had wanted to raise this issue

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11:43:53 1 Do you recall seeking -- sorry. Do you  
 2 recall receiving any specific guidance from  
 3 Ms. Holiday about how to handle this particular  
 4 situation?  
 5 A I don't know, because I think  
 6 Ms. Holiday -- that's where she referred to ELRO.  
 7 Q So let me ask you: What is ELRO?  
 8 A Employee Labor Relations Office.  
 9 Q Okay. So this -- earlier I asked about  
 10 Armana Simmons.  
 11 A Oh, okay. That's -- okay. I don't think  
 12 she's there anymore.  
 13 Q Okay.  
 14 A But -- okay.  
 15 Q So who -- well, she says she spoke with  
 16 Ms. Simmons at ELRO.  
 17 Do you remember now who Ms. Simmons was?  
 18 A She brought -- in ELRO, they have -- I  
 19 don't know if they call them caseworkers, but  
 20 individuals who handle various cases. They have  
 21 someone who handles concerns regarding teacher --  
 22 the teachers, the teachers' union. Then they have

11:44:48 1 someone who concerns with administrators. They have  
 2 someone who deals with the concerns of support; so  
 3 secretarial, maintenance -- you know,  
 4 noninstructional.  
 5 And so those are the people who deal with  
 6 those type of things. Any type of union issues or  
 7 anything dealing with employee labor. Uh-huh.  
 8 Q And do those individuals have -- what can  
 9 those individuals do in response to concerns?  
 10 A I guess provide assistance, I don't know  
 11 in which manner, and guidance on how to handle  
 12 situations.  
 13 Q And they would provide guidance to  
 14 principals?  
 15 A They could provide guidance more so to  
 16 the employee.  
 17 Q Okay.  
 18 A Right? Or, you know, they may say --  
 19 they may say to the principal, "You can have them  
 20 contact me" or "Refer them to me," you know.  
 21 Q Okay. So if we look back at the email  
 22 chain --

11:45:49 1 A Uh-huh.  
 2 Q -- Ms. Holiday offers to come to the  
 3 meeting with Ms. Eller; is that correct?  
 4 A Yes.  
 5 Q Is it common for Ms. Holiday to join you  
 6 in meetings with teachers?  
 7 A If I -- if necessary. Like I said  
 8 earlier, if it's a situation I feel like, okay, I  
 9 need assistance, then yes. But it's very -- it's --  
 10 unless it's -- like I said, if it's a situation I  
 11 feel as though I need some help or direction how to  
 12 handle this, especially a situation I've never dealt  
 13 with before. Uh-huh.  
 14 Q Would you say you meet with a teacher and  
 15 the instructional director once a year?  
 16 A All my teachers?  
 17 Q No. Just -- you have a -- I'm just  
 18 asking about how often you may have a meeting  
 19 between yourself, a teacher, and an instructional  
 20 director.  
 21 A That varies. Yeah.  
 22 Q Do you think in a typical school year it

11:46:04 1 happens once?  
 2 A Maybe once.  
 3 Q Have there been --  
 4 A Once or twice.  
 5 Q -- school years where you've had no  
 6 meeting between a teacher, an instructional  
 7 director, and yourself?  
 8 A Yeah.  
 9 Q Okay.  
 10 A Yes.  
 11 Q And in the email response to Ms. Holiday,  
 12 you state that you wanted to get a sense of the  
 13 situation first.  
 14 Why did you decide to not have her  
 15 attend?  
 16 A Because I wanted to first find out, you  
 17 know, as far as it -- the situation, as far as  
 18 this -- the whole bus incident, if we could really  
 19 try to investigate it, go back to it, and see  
 20 whether a meeting was necessary or not.  
 21 Q Okay.  
 22 A Because I felt she wanted us to do

11:47:45 1 something to that child who did it, but I didn't  
 2 know who the child was. I mean, it was evident --  
 3 if you let us know who it is, we're going to address  
 4 it. But if I can't -- if you can't tell me who it  
 5 is or give me some sense, then it's hard for me to  
 6 address someone who I don't know who it is.  
 7 Q Understood.  
 8 And it looks from the email like you  
 9 planned to meet with her during her planning period  
 10 on that Friday; is that correct?  
 11 A Yeah. Yeah.  
 12 Q Do you remember that discussion with  
 13 Ms. Eller?  
 14 A I don't.  
 15 I'm sorry. I thought I had turned my  
 16 phone off.  
 17 I -- I think -- I don't think we ever had  
 18 one, because I think the next discussion we had, I  
 19 think -- I don't remember.  
 20 Q Okay.  
 21 A The meetings I remember was when she came  
 22 and said "I'm going to have to leave."

11:45:45 1 Q Okay.

2 A So I don't know if we had one with this

3 one or not. I can't recall.

4 Q Okay. Let's look at the next email.

5 MR. McSORLEY: This will be

6 Plaintiff's 55.

7 (King Deposition Exhibit 55 was marked

8 for identification and attached to the transcript.)

9 THE WITNESS: Yeah.

10 Yeah, that's -- I remember -- I believe

11 that next meeting was when she told me.

12 BY MR. McSORLEY:

13 Q Right.

14 So just to confirm, the email chain we

15 were just reviewing, Plaintiff's 54, concerned an

16 incident on October 5<sup>th</sup>.

17 A Uh-huh.

18 Q And then this email discusses a meeting

19 on October 7<sup>th</sup>.

20 A Uh-huh.

21 Q And you would agree that your report of

22 this meeting states that Ms. Eller shared she would

11:50:14 1 be taking leave.

2 A Yes.

3 Q So then this meeting on October 7<sup>th</sup> is

4 the meeting you're remembering with Ms. Eller?

5 A Uh-huh.

6 Q Okay. So can you describe in a little

7 bit more detail how that meeting went?

8 A She came to me. She was visibly upset.

9 And I was like, "My gracious." You know, "What's

10 wrong, Ms. Eller? What's going on?"

11 But she just kept -- she was, like,

12 "Ms. King, I just can't take it anymore."

13 And so then that's when she -- that's the

14 first time when she started sharing with me about

15 some of her past experiences at her different

16 schools. And she said how the -- the incident at

17 Madison triggered what she went through from the

18 past.

19 And I was just like -- I was -- because

20 she was -- I believe she was, like, crying. She was

21 very -- and I was, like, "Oh, my God. I'm so

22 sorry."

11:53:55 1 And she said, "I want you to know I

2 appreciate what you've done. You-all is treating me

3 with respect." You know, "I know you tried," she

4 said, "but I just can't take this anymore."

5 And from what I gather -- because I do

6 remember that meeting -- it was like -- it was

7 more -- it was almost more like what went on at --

8 previously. She was still really -- and this --

9 this -- I guess the bus incident, the hallway

10 incident, she was just like, "I just can't handle it

11 anymore."

12 And I was -- I was just -- I was really

13 sorry for her, you know. I gave her a tissue, the

14 whole shaboo.

15 And so she was like, "I think" -- you

16 know, "I'm going to have to leave," you know.

17 Because I even said to her, you know, "You need to

18 go home."

19 I didn't know she was going to -- then

20 she told me she was going to "leave" leave. Because

21 I was like -- she was visibly upset. I felt -- I

22 mean, even now I felt really bad for her, because

11:51:51 1 she was -- and I was -- I just was very -- I was

2 like, "Oh, my God. I'm so sorry."

3 And she was like, "No. No. It's not

4 you."

5 You know, she's not even -- she said she

6 liked the school, you know.

7 She was like, "I know you tried," she

8 said, "but these situations" -- and that's when she

9 told me about some situations that happened at the

10 high school.

11 And I was, "Oh, my gracious."

12 So I was, like, "Okay. I totally" -- "I

13 understand."

14 And we went from there. But it was -- it

15 was sad. You know what I'm saying? For -- to --

16 yeah. Uh-huh.

17 Q If you had been told about the difficult

18 situation she had had at her prior school, do you

19 think you would have provided more training to

20 teachers about how to approach Ms. Eller?

21 MR. SHARMA: Objection.

22 You can answer.

11:52:42 1 THE WITNESS: I don't know.  
 2 BY MR. MCSORLEY:  
 3 Q If you had known that Ms. Eller had had  
 4 such difficulty at her private school, do you think  
 5 it would have changed the way you approached some of  
 6 the student incidents we just discussed?  
 7 MR. SHARMA: Objection.  
 8 You can answer.  
 9 THE WITNESS: No, because we -- those  
 10 incidents were disrespect.  
 11 So the way I handle disrespect towards  
 12 someone you may call fat, the same I'm going to  
 13 handle disrespect someone you call out of their  
 14 name.  
 15 So I would have handled the consequence  
 16 the same, because it's disrespect.  
 17 BY MR. MCSORLEY:  
 18 Q Okay. Do you think it would have been  
 19 helpful to have training from the district  
 20 specifically about being inclusive of people who are  
 21 transgender?  
 22 MR. SHARMA: Objection.

11:53:12 1 You can answer.  
 2 THE WITNESS: I don't know. To be honest  
 3 with you, I don't know.  
 4 BY MR. MCSORLEY:  
 5 Q If you had known that Ms. Eller had had  
 6 the difficulties she had at her prior school, do you  
 7 think you would have changed anything with the way  
 8 you approached the situation with Ms. Eller at your  
 9 school?  
 10 MR. SHARMA: Objection.  
 11 You can answer.  
 12 THE WITNESS: No. Because, again, you  
 13 are there to teach.  
 14 I would have an issue if you not teaching  
 15 my students. I don't have an issue if you -- you --  
 16 whatever your sexual orientation. I have an issue  
 17 teaching my students. But would I have -- no.  
 18 BY MR. MCSORLEY:  
 19 Q In the email, Dr. Coley -- I'm sorry. In  
 20 the email, Ms. Holiday reports to Dr. Coley that you  
 21 stated you could only approve up to ten days of  
 22 leave.

11:54:56 1 A Uh-huh.  
 2 Q Was that correct?  
 3 A Yes. And that's -- that's across the  
 4 board. That's how it works.  
 5 Anything over ten days, the employee has  
 6 to go through absent management. All right? So I  
 7 can approve -- the system wouldn't even let me  
 8 approve anything over ten days, consecutive  
 9 ten days.  
 10 Now, if it's sporadic, then -- you know.  
 11 But if it's consecutive ten days, I can -- I can't  
 12 approve anything over. And they have to go -- I'm  
 13 not saying they won't be approved. But then you  
 14 have to go through absent management, which is  
 15 within payroll and benefits.  
 16 Q Okay. And if you look at the email above  
 17 the email from Ms. Holiday to Dr. Coley, Dr. Coley  
 18 responds: "Did Armana reach out to Courtney? And  
 19 what specifically are teachers saying to her?"  
 20 Do you see that?  
 21 A Yes.  
 22 Q Do you remember meeting -- or speaking

11:56:09 1 with Ms. Simmons from ELRO about Ms. Eller?  
 2 A I believe -- she may have called me.  
 3 Q Okay.  
 4 A She may have called me.  
 5 Q And it says: "What specifically are  
 6 teachers saying to her?"  
 7 Do you understand what that means?  
 8 A I don't, because I never received  
 9 anything about teachers saying anything to her. The  
 10 only thing I recall were, like, the -- were the  
 11 student incidents. So that's why I don't -- I don't  
 12 know what that --  
 13 Q Did you ever talk to other teachers about  
 14 Ms. Eller being -- having difficulties at the  
 15 school?  
 16 A No.  
 17 Q Okay. Dr. Coley says: "Sounds like she  
 18 may be planning to go out."  
 19 And then Ms. Holiday responds: "Ms. King  
 20 doesn't think she will be back."  
 21 Do you see that?  
 22 A Uh-huh.

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11:57:12 1 Q Did you communicate to Ms. Holiday that  
 2 you thought Ms. Eller was leaving permanently?  
 3 A I thought she would be out for a while.  
 4 I didn't think she was going to be out permanently,  
 5 to be honest with you.  
 6 But when she had talked -- when she had  
 7 told me about her going out, I told her, I said,  
 8 "You know I can't approve beyond ten days. That if  
 9 you're going to go beyond ten days, you need to make  
 10 sure you contact absence management," like that.  
 11 But from -- how she was visibly upset and  
 12 from what she was telling me, I didn't think -- I  
 13 didn't think she was going to leave, but -- I didn't  
 14 think she was going to be back for a while. I  
 15 thought she was going to be on leave, you know, and  
 16 then come back.  
 17 Q Okay.  
 18 A Uh-huh.  
 19 MR. MCSORLEY: Why don't we take a break.  
 20 (A recess was taken.)  
 21 BY MR. MCSORLEY:  
 22 Q Just a couple more questions, and I don't

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12:05:04 1 have anything else.  
 2 We talked about this a little bit.  
 3 Just to clarify, when were you required  
 4 to report disciplinary incidents to the school  
 5 district? So above the school level.  
 6 A The only -- if it's a -- now, like, we  
 7 talked about the levels. Levels five -- like,  
 8 expellable offenses, that goes beyond. Like, I  
 9 can't expel children. We just put in a request for  
 10 expulsion. So that goes to -- through our PPW, then  
 11 to our office of appeals; right? So that goes  
 12 beyond.  
 13 Even, like I say, for instance, if it's  
 14 something that's extended, long-term suspension, our  
 15 people personnel worker will get involved with that.  
 16 But besides that, it's really not  
 17 required to go -- and, again, a lot of times, if  
 18 they get involved, it's because a parent feels as  
 19 though it was wrong and they want it -- they want it  
 20 overturned; so they go beyond me.  
 21 But as far as we calling and saying, hey,  
 22 I -- I sent this child to in-school suspension for

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12:06:28 1 two -- no. But they are -- like I said, the level 5  
 2 for sure goes beyond the schoolhouse.  
 3 Q Okay. Setting aside discipline, how  
 4 about issues of discrimination? Do you ever report  
 5 issues of discrimination towards other students to  
 6 your supervisor?  
 7 A It really is the context of the  
 8 situation. Like, if the situation -- oh, sorry.  
 9 If the situation -- if, from that  
 10 situation, it has caused -- it has escalated into  
 11 something that's bringing, like, say, for instance,  
 12 disturbance into the school body, or what, about a  
 13 fight or something like that, but -- so I'm really  
 14 talking the context of it.  
 15 Q Can you think of any instances of  
 16 discrimination that you've had to discuss with your  
 17 supervisors?  
 18 A We do if it's social media. It's social  
 19 media things that can escalate.  
 20 But as far as discrimination, uh-uh.  
 21 Q So what do you mean by "social media"?  
 22 A You know, the children going back and

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12:07:48 1 forth. You know, say, for instance, you know, Oh,  
 2 my boyfriend now -- dating this girl and -- so now  
 3 I'm going to send a picture -- inappropriate  
 4 picture, or something like that --  
 5 Q I see.  
 6 A -- you know.  
 7 Q Okay. So not issues of discrimination on  
 8 social media?  
 9 A No. Uh-uh.  
 10 Q Okay. And do you have to report  
 11 disciplinary data up to the school district?  
 12 A I don't have to report it because they  
 13 see it. We have -- we have something called  
 14 SchoolMAX. And so suspensions and that type of  
 15 information is put into the SchoolMAX.  
 16 Q Okay.  
 17 A It's more so for suspensions.  
 18 If they require -- like, level one,  
 19 level two, like I talked about before, that may or  
 20 may not go into SchoolMAX depending on how the  
 21 situation is done.  
 22 Q If you had identified the student who

12:02:53 1 yelled at Ms. Eller in the parking lot, what level  
 2 would that incident have been?  
 3 A It probably -- like, I -- a level one or  
 4 two.  
 5 I would have done the same -- like, with  
 6 the boy who did it in the -- what he said in the  
 7 hallway, we would have done the same thing --  
 8 warning and call that parent. Because like I said,  
 9 my parents -- as you could see from my -- I dealt  
 10 with, we had an incident with Conde again; so we --  
 11 that's how we usually handle disrespect.  
 12 Q And would you distinguish disrespect from  
 13 discrimination?  
 14 A Actually, to me -- and maybe that's -- if  
 15 you call a person out their name, I looked at it you  
 16 was being disrespectful.  
 17 Q Would that be the case if a white student  
 18 used a remarkable epithet towards a black teacher?  
 19 A I would say you were being disrespectful.  
 20 Q Okay.  
 21 A And, you know, using the term  
 22 discrimination -- more so from the code, I use

12:09:47 1 "disrespect."  
 2 Q Okay.  
 3 A And then having to -- and, again, all  
 4 these things are teachable moments. So when you  
 5 have that conversation with that student, then you  
 6 would talk about that. You know what I'm saying?  
 7 But as far as the offenses, it would have  
 8 been disrespect.  
 9 Q Understood.  
 10 Did the school district provide you with  
 11 the Maryland guidelines for providing safe spaces  
 12 for transgender and gender-nonconforming youth?  
 13 A I'm unsure if they did. And it may  
 14 have -- and it also may be -- something was given to  
 15 our counselors. I can't recall that.  
 16 Q You don't recall ever seeing the State of  
 17 Maryland guidelines for gender identity  
 18 nondiscrimination?  
 19 A I don't remember.  
 20 Q Okay.  
 21 MR. MCSORLEY: Okay. I think that is all  
 22 the questions we have from the plaintiffs.

12:11:48 1 MR. SHARMA: Okay.  
 2 Ms. King, I have a few questions for  
 3 you --  
 4 THE WITNESS: Sure.  
 5 MR. SHARMA: -- if I may.  
 6 E X A M I N A T I O N  
 7 BY MR. SHARMA:  
 8 Q Tell me about James Madison Middle  
 9 School.  
 10 What kind of student body do you have?  
 11 A It's an awesome school. I love my  
 12 school. Our diverse -- it's very -- predominately  
 13 African-American.  
 14 Q Okay.  
 15 A Now we have about -- close to 800 --  
 16 about 820 students.  
 17 Q Okay.  
 18 A We -- are 6<sup>th</sup>, 7<sup>th</sup>, and 8<sup>th</sup>.  
 19 During that time, I believe, though, we  
 20 were just 7<sup>th</sup> and 8<sup>th</sup>. We've just been -- what  
 21 is this? 2020. So it may have been -- we may have  
 22 had a 6<sup>th</sup> then.

12:11:26 1 When I first came in ten years ago, it  
 2 was just 6<sup>th</sup> and 7<sup>th</sup> -- I'm sorry -- 7<sup>th</sup> and 8<sup>th</sup>.  
 3 But now we're 6<sup>th</sup>, 7<sup>th</sup>, and 8<sup>th</sup>.  
 4 We're in Upper Marlboro.  
 5 Q That was kind of a -- that's a good segue  
 6 to my next --  
 7 A Oh, okay.  
 8 Q -- question.  
 9 Tell me about the community that the  
 10 school is located in. How would you describe it?  
 11 A Quote/unquote, suburb. I don't know if  
 12 you're familiar with Upper Marlboro area. Most of  
 13 my students live in houses. I don't have many --  
 14 excuse me -- apartment dwellers, if you will.  
 15 Now -- now I'm seeing more of my  
 16 students -- I mean, I see many grandparents raising  
 17 their -- grandparent -- their grandchildren.  
 18 But an active community. I have a  
 19 very -- I have a great -- their involvement. There  
 20 are many two-parent households. And even if the  
 21 parents are not together, both parents are active in  
 22 their children's life.

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12:13:24 1 Q You had said something earlier during  
 2 direct examination which was that parent meetings  
 3 usually get the job done, something to that  
 4 effect --  
 5 A Uh-huh.  
 6 Q -- if you had to get the parent involved.  
 7 A Parent conferences.  
 8 Q Why is that?  
 9 A Many of my -- many of my parents are  
 10 educators. If you know where my -- where my school  
 11 is located and the area in which it is, many  
 12 educators live in that area. And so -- and many of  
 13 them are expecting for their children to do well in  
 14 school, go to college, you know. So they understand  
 15 the importance of education. And they do not want  
 16 in their children's file "my child was suspended" or  
 17 anything of that nature.  
 18 Q So would it be fair to say they were no  
 19 nonsense when it came to their students' education?  
 20 A Yes.  
 21 Q Wanted their students to succeed?  
 22 A Yes.

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12:13:13 1 Q Okay. And were the students, in general,  
 2 respectful of the staff, as far as you know as a  
 3 principal?  
 4 A Yes.  
 5 Q Did you foster an environment where they  
 6 were told or informed that that was what was  
 7 expected?  
 8 A Yes. I'm -- my leadership model is firm,  
 9 fair, and fun.  
 10 Q Okay. Firm, fair, and fun.  
 11 A Uh-huh. So understanding that we are  
 12 going to be respectful. And I expect for everyone  
 13 to follow the procedures and the policies and all  
 14 that are in place.  
 15 Q That was for students with each other?  
 16 A Everyone.  
 17 Q And the staff?  
 18 A Everyone.  
 19 Q What about the staff? Was your staff  
 20 diverse during the period in question?  
 21 A Predominantly African-American and  
 22 predominantly female.

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12:13:57 1 Q Did everyone typically get along with  
 2 each other?  
 3 A Yes. We have a very -- I create a very  
 4 family-oriented cultural in our school.  
 5 Q And that was the case when Ms. Eller was  
 6 employed there?  
 7 A Uh-huh.  
 8 Q I want to talk about Ms. Eller for a  
 9 second.  
 10 A Uh-huh.  
 11 Q What was your impressions of her as a  
 12 teacher?  
 13 A She did a great job. I had opportunity  
 14 to observe her in the classroom and her lessons and  
 15 all. And one thing I was impressed with is that she  
 16 knew her content and knew how to deliver to the  
 17 students. Uh-huh.  
 18 Q were you sad to see her go?  
 19 A I was sad especially when I found out the  
 20 situation, you know, because she was a good teacher.  
 21 And I think that's why I didn't -- like, when I talk  
 22 about the parent -- that one parent concern. But I

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12:14:45 1 didn't get any issues because our parents want our  
 2 teachers -- "I want my child to be taught." And so  
 3 she -- she was a good teacher.  
 4 Q Okay. You were asked a lot of questions  
 5 today about training.  
 6 A Uh-huh.  
 7 Q And I think that, your typical response,  
 8 you had mentioned the word equity.  
 9 A Uh-huh.  
 10 Q What did you mean by "equity"?  
 11 Equity is a big deal, you kept saying.  
 12 A Yeah. Treating people fairly across the  
 13 board.  
 14 Q Irrespective of their race?  
 15 A Race, gender, weight, how they look.  
 16 Any -- yeah. Where they --  
 17 Q Sexual orientation?  
 18 A -- live. Sexual orientation.  
 19 Q Sexual identity?  
 20 A Yes.  
 21 Q Okay. And that kind of goes back to your  
 22 theme of fun, fair, firm?

12:15:24 1 A A leadership style.  
 2 Q It's all kind of connected, isn't it?  
 3 A Uh-huh.  
 4 Fairness is very important.  
 5 Q Other than the two incidents which you  
 6 described during your direct examination, were  
 7 you --  
 8 MR. MCSORLEY: Objection.  
 9 There were three incidents described.  
 10 BY MR. SHARMA:  
 11 Q Other than the incidents that were  
 12 discussed earlier today, were you aware of any other  
 13 incidents relating to Ms. Eller and complaints or  
 14 concerns that she may have had?  
 15 A No.  
 16 Q Do you believe, with respect to the  
 17 incidents that you are aware of, that the school and  
 18 your administration was deliberately indifferent to  
 19 her concerns?  
 20 A I think we treated her fairly and  
 21 addressed the concern like it was anyone else.  
 22 Q Were those concerns addressed properly?

12:16:12 1 A Yes.  
 2 Q To the best of your ability?  
 3 A Yes, to the best of our ability. Uh-huh.  
 4 Q Did you ever treat Ms. Eller differently  
 5 because she was a transgender woman?  
 6 A No. Uh-uh.  
 7 Q Do you know of anyone else that may have  
 8 done so in your school?  
 9 A No.  
 10 Q Staff members?  
 11 A No.  
 12 Q Do you believe that the environment in  
 13 your school was hostile to Ms. Eller --  
 14 A No.  
 15 Q -- because of her transgender status?  
 16 A No.  
 17 Actually, when she -- when she told me  
 18 that she wanted to leave, she kept saying no -- from  
 19 what I gather from our conversation was -- it  
 20 wasn't -- those things may have triggered, but it  
 21 seemed like, to me, what happened to her previously  
 22 really had an effect on her because she kept on

12:16:58 1 saying, "Ms. King, it's not you." I mean --  
 2 because, I mean, I felt, like, really bad.  
 3 She's like, "It's not you. You done all  
 4 you can do. I appreciate it." She said, "but I  
 5 just" -- "this has triggered past incidents."  
 6 Q Okay. At any time that Ms. Eller was  
 7 employed at your school, were you aware that she had  
 8 filed an EEOC charge against the school district?  
 9 A No.  
 10 Q At any time during her employ at your  
 11 school, were you aware that she had filed a  
 12 discrimination complaint against a previous  
 13 administrator?  
 14 A No.  
 15 Q What are PS-74 reports or referrals?  
 16 A It's a disciplinary -- disciplinary  
 17 action form. So if a -- miss -- a student does some  
 18 type of infraction, misbehavior within the  
 19 classroom, the teacher can document on that form and  
 20 send it to the administrator.  
 21 Q And it's requesting some sort of  
 22 discipline be imposed on the student?

12:17:54 1 A And some teachers do it and some teachers  
 2 don't. Some teachers will do it -- just do it by  
 3 talking to the -- you know, it's a form we have been  
 4 having for a while, since I started teaching. But  
 5 now with email -- and sometimes the teachers just  
 6 tell the administrator, you know, verbally.  
 7 Q So --  
 8 A But the form is there.  
 9 Q -- irrespective of whether you got a  
 10 formal form or an email, you would always address  
 11 the concerns from Ms. Eller?  
 12 A Yes.  
 13 Q Okay. Do you recall any incidents in  
 14 which Ms. Eller actually submitted a formal PS-74  
 15 report to the administration?  
 16 A I don't recall. It would have gone to  
 17 the 8<sup>th</sup> grade administrator, but I don't recall.  
 18 Q And the PS-74 is required to be completed  
 19 by the person who's referring the student for  
 20 discipline; correct?  
 21 A Right.  
 22 Q So if Ms. Eller had a complaint, it would

12:15:42 1 have been incumbent upon her to fill out and submit  
 2 the PS-74 to the administration?  
 3 A Right. But, again, now, with emails and  
 4 things of that nature -- all teachers don't do them  
 5 anymore. You know, they may have just sent it to --  
 6 send us an email --  
 7 Q Okay.  
 8 A -- you know.  
 9 Q And, again, they're treated the same  
 10 whether there's an email or --  
 11 A Right. Email -- yes. Right.  
 12 Q And just -- but just to make sure I'm  
 13 understanding, sitting here today, you're unaware of  
 14 any PS-74 referrals that were made by Ms. Eller?  
 15 A Yeah, I'm unaware.  
 16 Q Are you familiar with a form called  
 17 Harassment and Bullying? It's a form that I think  
 18 it's included in the code of conduct --  
 19 A Yes.  
 20 Q -- packet.  
 21 A Uh-huh.  
 22 Q Are you aware of any such form that was

12:19:23 1 ever submitted by Ms. Eller to the administration  
 2 while she was employed at your school?  
 3 A No.  
 4 MR. SHARMA: I don't think I have  
 5 anything else.  
 6 Thank you so much.  
 7 THE WITNESS: Okay.  
 8 MR. SHARMA: They may have some  
 9 follow-up, but --  
 10 MR. McSORLEY: No follow-up from  
 11 plaintiff's.  
 12 MR. SHARMA: You have a right to read  
 13 the -- we can go off the record.  
 14 (Off the record at 12:19 p.m.)  
 15 (Signature was waived.)  
 16  
 17  
 18  
 19  
 20  
 21  
 22

12:18:58 1  
 2 Certificate of shorthand reporter - notary public  
 3 I, Susan E. Alldridge, Registered Professional  
 4 Reporter, Certified Shorthand Reporter, the officer  
 5 before whom the foregoing deposition was taken, do  
 6 hereby certify that the foregoing transcript is a  
 7 true and correct record of the testimony given; that  
 8 said testimony was taken by me stenographically and  
 9 thereafter reduced to typewriting under my  
 10 supervision; that reading and signing was not  
 11 requested; and that I am neither counsel for or  
 12 related to, nor employed by any of the parties to  
 13 this case and have no interest, financial or  
 14 otherwise, in its outcome.  
 15 IN WITNESS WHEREOF, I have hereunto set my hand  
 16 and affixed my notarial seal this 28th day of  
 17 January 2020.  
 18  
 19  
 20  
 21 Susan E. Alldridge, RPR  
 22 NOTARY PUBLIC IN AND FOR THE DISTRICT OF COLUMBIA



00:00:00 1                    IN THE UNITED STATES DISTRICT COURT  
2                    FOR THE DISTRICT OF MARYLAND  
3                    Southern Division  
4  
5 JENNIFER ELLER                    )  
6                    Plaintiff,                    )  
7                    VS                    ) Case No.:  
8                    PRINCE GEORGE'S COUNTY                    ) 18-cv-03649-TDC  
9                    PUBLIC SCHOOLS, et al.,                    )  
10                    Defendants.                    )

11                    -----  
12                    DEPOSITION OF JOCELYN ISOM  
13                    Tuesday, February 4, 2020, 10:00 a.m.

14  
15                    Arnold & Porter Kaye Scholer  
16                    601 Massachusetts Avenue, NW  
17                    Washington, DC

18  
19  
20  
21  
22

00:00:01 1 DEPOSITION OF JOCELYN ISOM,  
 2 a witness herein, called by the Plaintiff for  
 3 examination, taken pursuant to the Federal Rules of  
 4 Civil Procedure, by and before Susan E. Alldridge,  
 5 RPR and Notary Public in and for the District of  
 6 Columbia, Arnold and Porter, 601 Massachusetts  
 7 Avenue, NW, Washington, DC, on Tuesday, February 4,  
 8 2020, at 10:00 a.m.  
 9  
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 12  
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 17  
 18  
 19  
 20  
 21  
 22

2

00:00:01 1  
 2 APPEARANCES  
 3  
 4 ON BEHALF OF PLAINTIFF JENNIFER ELLER:  
 5 CARL S. CHARLES, ESQUIRE  
 6 LAMBDA LEGAL  
 7 120 Wall Street  
 8 19th Floor  
 9 New York, NY 10005-3919  
 10 (212)809-8585  
 11  
 12 ELLIOTT CRUCHLEY MOGUL, ESQUIRE  
 13 ARNOLD & PORTER KAYE SCHOLER LLP  
 14 601 Massachusetts Avenue, NW  
 15 Washington, DC 20001-3743  
 16 (202)942-6806  
 17  
 18  
 19  
 20  
 21  
 22

3

00:00:02 1  
 2 APPEARANCES  
 3  
 4 ON BEHALF OF PRINCE GEORGE'S COUNTY PUBLIC SCHOOLS,  
 5 ET AL., DEFENDANTS:  
 6 AMIT K. SHARMA, ESQUIRE  
 7 MCCOLLUM & ASSOCIATES, LLC  
 8 7309 Baltimore Avenue  
 9 Suite 117  
 10 College Park, MD 20740  
 11 (301)864-6070  
 12  
 13  
 14  
 15  
 16  
 17  
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4

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 Identity Non-Discrimination  
 16  
 17  
 18  
 19  
 20  
 21  
 22

5

00:00:02 1  
 2 PROCEEDINGS  
 3 Whereupon,  
 4 JOCELYN ISOM,  
 5 being first duly sworn or affirmed to testify to the  
 6 truth, the whole truth, and nothing but the truth,  
 7 was examined and testified as follows:  
 8 EXAMINATION  
 9 BY MR. CHARLES:  
 10 Q All right. So, Ms. Isom, like I said, my  
 11 name is Carl Charles.  
 12 A Okay.  
 13 Q I work for Lambda Legal. And this is my  
 14 colleague, Elliott Mogul. He's -- he works here at  
 15 Arnold & Porter. They're co-counsel with us on this  
 16 case.  
 17 A Okay.  
 18 Q So we represent Jennifer Eller.  
 19 A Yes.  
 20 Q And this lawsuit is against the  
 21 defendants, which are Prince George's County Public  
 22 Schools, Prince George's County Board of Education.

10:24:10 1 and Superintendent Goldson.  
 2 A Okay.  
 3 Q In this case, Ms. Eller claims that the  
 4 defendants have discriminated against her because of  
 5 her sex and her transgender status.  
 6 A Yes, ma'am -- yes, sir.  
 7 Q Could you please state your name?  
 8 A Jocelyn Arlene Isom.  
 9 Q Okay. And address, please, as well.  
 10 A 428 Shady Glen Drive --  
 11 Q -- 428?  
 12 A -- Capitol Heights, Maryland --  
 13 Q Okay.  
 14 A -- 20743.  
 15 Q All right. Have you ever been deposed  
 16 before?  
 17 A No.  
 18 Q Okay.  
 19 A I'm very interested. Is it like  
 20 television? Special Victims Unit.  
 21 Q I promise it will not be that  
 22 interesting.

10:24:59 1 Have you ever testified at a trial?  
 2 A No. I had -- I never testified at a  
 3 trial, no.  
 4 Q Okay. Have you ever been a plaintiff in  
 5 a case or a defendant?  
 6 A I've been a defendant in traffic court.  
 7 Q Okay.  
 8 A Uh-huh.  
 9 Q And what were the circumstances of that?  
 10 A When you -- oh, I know. The officer  
 11 claimed I didn't stop at a stop sign --  
 12 Q Okay.  
 13 A -- and turned. And I said I was not  
 14 guilty, and I won.  
 15 Q Oh, great.  
 16 A So I'm ready to bring it on.  
 17 Just kidding.  
 18 You're not suing me; so I'm fine.  
 19 Q And just for our records, when was that?  
 20 Do you remember approximately what year  
 21 that was?  
 22 A Oh, my goodness. I still had my truck;

10:25:36 1 so it had to be at least six years ago.  
 2 Q That's totally fine. No problem.  
 3 A Uh-huh.  
 4 Q So I'm going to start with some ground  
 5 rules for our deposition just so you understand sort  
 6 of how this will function --  
 7 A Okay.  
 8 Q -- the parameters of that, before we  
 9 really get into the questions.  
 10 A Yes.  
 11 Q Do you understand -- I'm assuming you do,  
 12 but do you understand you're under oath just as if  
 13 you were in court testifying?  
 14 A Absolutely.  
 15 Q Okay. Great. I figured you picked that  
 16 up when --  
 17 A Uh-huh. Yeah.  
 18 Q -- Sue put you under oath, but we have to  
 19 ask.  
 20 So we would ask that you answer each  
 21 question fully --  
 22 A Uh-huh.

10:26:09 1 Q -- and to the best of your ability.  
 2 A Yes.  
 3 Q Okay. So do please, as you have been,  
 4 answer all questions with a verbal response --  
 5 A Uh-huh.  
 6 Q -- because as you know, Sue is recording  
 7 this with her excellent typing skills and also --  
 8 A She can't put nods up and down.  
 9 Q That's exactly. Yeah.  
 10 A Gotcha.  
 11 Q So at times, you know, as we're talking,  
 12 if you are nodding, I might just say, can you --  
 13 A Can you speak --  
 14 Q Yeah. Yeah. Exactly.  
 15 I would also ask that you just wait until  
 16 I finish the question before responding. If you  
 17 need me to have -- if you need me to repeat a  
 18 question, just ask. I'm happy to repeat a question.  
 19 And, actually, the -- Sue will repeat it back to you  
 20 as well.  
 21 A Okay.  
 22 Q Let me know if you don't understand a

10

10:26:55 1 question, and I can rephrase it.  
 2 A Okay.  
 3 Q And as I said in the hallway, just let me  
 4 know if you need a break. If we're in the middle of  
 5 a question and you feel like you need a break, let  
 6 me finish the question, and then just say --  
 7 A -- "I need a break."  
 8 Q -- "Carl, can I have a break?"  
 9 A Sure.  
 10 Q Yeah.  
 11 This next one is pretty important; so --  
 12 Amit, Mr. Sharma --  
 13 A Uh-huh.  
 14 Q -- may object to some of my questions.  
 15 If he poses questions to you, I may object to some  
 16 of his questions. And that will come later in the  
 17 day.  
 18 The objections that he or I may do are  
 19 for the Court when they're reviewing the transcript  
 20 later. So those objections don't mean you don't  
 21 need to answer the question.  
 22 Does that make sense?

11

10:27:38 1 A I'll ask if --  
 2 Q Yeah.  
 3 So the objections -- unless Mr. Sharma  
 4 says explicitly do not answer that question --  
 5 A Sure.  
 6 Q -- then I will ask you to go ahead and  
 7 answer.  
 8 A Okay.  
 9 Q So it can be a little jarring at first  
 10 when, you know, he might say, "Objection," and  
 11 you're like, "Do I not respond?"  
 12 But go ahead and respond unless he says  
 13 do not respond.  
 14 A "Do not respond."  
 15 Q Yeah.  
 16 A Okay.  
 17 Q Yeah.  
 18 So just again, you understand you're  
 19 under obligation to answer every question unless you  
 20 are explicitly instructed not to?  
 21 A Uh-huh.  
 22 Q Okay. Great.

12

10:28:06 1 Do you have any questions about how this  
 2 will work?  
 3 A No. I'm just ready to go.  
 4 Q Okay. Great.  
 5 So, then, these are just sort of form and  
 6 function. I have to go through these.  
 7 Is there any reason you can think of why  
 8 you wouldn't be able to answer my questions fully or  
 9 completely?  
 10 A No, I don't believe so.  
 11 Q Okay. Are you taking any medications  
 12 that might impact your ability --  
 13 A No.  
 14 Q -- to answer?  
 15 A I take Neurontin, but I take it in the  
 16 evening. It kind of makes you loopy.  
 17 Q Gotcha.  
 18 A Yeah.  
 19 Q Okay. And, again, I'm assuming not, but  
 20 I do have to ask: Are you under the influence of  
 21 alcohol or any substance that would impair your  
 22 ability to answer questions?

13

10:28:39 1 A No.  
 2 Q Okay. And do you have any physical  
 3 limitations today that might impact your ability?  
 4 Chronic pain?  
 5 A Yeah. I have back -- so sometimes I do  
 6 have to get up.  
 7 Q Okay.  
 8 A I can't sit for a very long period of  
 9 time. It's a --  
 10 Q Okay.  
 11 A -- bad idea.  
 12 Q Okay. So we'll keep that in mind.  
 13 A Okay.  
 14 Q Thank you for letting me know.  
 15 A Uh-huh.  
 16 Q And a final note. You are, of course,  
 17 aware this deposition concerns Jennifer Eller?  
 18 A Yes.  
 19 Q And she is a transgender woman.  
 20 A Yes.  
 21 Q You know that.  
 22 A Uh-huh.

14

10:29:05 1 Q Okay. And as such, we will be referring  
 2 to -- and Amit as well -- we will be referring to  
 3 her using "she" or "her" as pronouns.  
 4 A Absolutely.  
 5 Q And, of course, "Ms. Eller," because  
 6 that's consistent with her female gender.  
 7 A Uh-huh.  
 8 Q And we ask that you do the same.  
 9 A Yes. Absolutely.  
 10 Q Okay. Great.  
 11 Okay. Let me have some water.  
 12 A I was confused about how it goes. I  
 13 wanted to see Ms. Eller, but -- I thought she would  
 14 be here, but --  
 15 Q No. No. So we're just deposing  
 16 witnesses.  
 17 A Sure.  
 18 Q And then we may or may not have a trial.  
 19 A Uh-huh.  
 20 Q But depositions are sort of in  
 21 preparation --  
 22 A Yeah.

15

10:29:37 1 Q -- for trial.  
 2 A In preparation, yeah.  
 3 Q Okay. So important note here: Do you  
 4 understand you're not a defendant --  
 5 A Yes.  
 6 Q -- in this case?  
 7 A I do. Otherwise there would be an  
 8 attorney sitting right here beside me.  
 9 Q So that's my next question.  
 10 A Yes.  
 11 Q You have not retained --  
 12 A No.  
 13 Q -- an attorney?  
 14 A No.  
 15 Q Okay. Have you met Mr. Sharma before?  
 16 A No.  
 17 Q Okay.  
 18 A Uh-uh.  
 19 Q Okay. But you understand he's  
 20 Defendants' attorney, so he represents the school  
 21 district?  
 22 A Prince George's County Schools.

16

10:30:06 1 Q That's right. That's right.  
 2 And so you understand he's not your  
 3 personal attorney?  
 4 Yeah.  
 5 A Unless the questions start getting a  
 6 little funny.  
 7 MR. SHARMA: You could hire me.  
 8 THE WITNESS: Exactly. If I start  
 9 getting uncomfortable, it's, like, "Can I have your  
 10 card?" Or one of you guys.  
 11 BY MR. CHARLES:  
 12 Q So you understand that what you two  
 13 discuss is not subject to attorney-client privilege?  
 14 A Okay. Thank you for telling me that.  
 15 Q Yeah.  
 16 A Uh-huh.  
 17 Q Did you speak with Mr. Sharma before  
 18 today's deposition?  
 19 A I spoke to someone at the law firm.  
 20 THE WITNESS: Did -- it wasn't you?  
 21 BY MR. CHARLES:  
 22 Q Maybe Mr. McCollum?

17

10:30:41 1 A Yes.  
 2 Q Okay.  
 3 A Yes.  
 4 Q Did you speak to --  
 5 A That sounds right.  
 6 Q -- Mr. McCollum on the phone or in  
 7 person?  
 8 A On the phone.  
 9 Q Okay.  
 10 A Never met.  
 11 Q And was there anyone else present when  
 12 you spoke to him?  
 13 A No. I was in my office.  
 14 Q Okay. And what did you speak about?  
 15 A Just letting me know that there was a  
 16 case and that I would be receiving a subpoena, which  
 17 I -- someone tried to serve me that Friday I wasn't  
 18 there.  
 19 Q Okay.  
 20 A But just -- just basically that, that I  
 21 wasn't a defendant. And the same sort of stuff that  
 22 you spoke about.

18

10:31:07 1 MR. SHARMA: Let me interject. She spoke  
 2 with me. It wasn't Mr. McCollum.  
 3 MR. CHARLES: Oh, thank you.  
 4 THE WITNESS: It was you. Okay.  
 5 I'm sorry.  
 6 MR. SHARMA: I just want to make sure the  
 7 record is accurate.  
 8 THE WITNESS: I knew I spoke to someone  
 9 there.  
 10 MR. CHARLES: Okay. Great.  
 11 THE WITNESS: I'm sorry.  
 12 MR. SHARMA: No. You're fine.  
 13 BY MR. CHARLES:  
 14 Q So Mr. Sharma told you about the  
 15 deposition?  
 16 A Yes.  
 17 Q Did he ask you to do anything to prepare?  
 18 A No.  
 19 Q Did he ask you --  
 20 A He said there will be -- if we were here  
 21 long, that there would be lunch, that sort of thing.  
 22 Q Okay.

19

10:31:28 1 A Just to make me know how comfortable I  
 2 would be.  
 3 Q Oh, great.  
 4 Okay. Did he ask you to do anything at  
 5 today's deposition?  
 6 A No.  
 7 Q Okay. Did he ask you to look at any  
 8 documents before today's deposition?  
 9 A No, I don't see anything.  
 10 Q Okay. So did you review any documents to  
 11 prepare for today, apart from what Mr. Sharma may  
 12 have asked?  
 13 A I -- there was -- there's a newspaper  
 14 article that I saw.  
 15 Q Okay. Okay.  
 16 A But I saw that a long time ago.  
 17 Q Okay.  
 18 A It's been a while.  
 19 Q But you didn't look through, say, old  
 20 emails or --  
 21 A No.  
 22 Q -- your files --

20

10:31:59 1 A No.  
 2 Q -- or any other communications?  
 3 A No.  
 4 Q Okay.  
 5 A I didn't.  
 6 Q Have you spoken with anyone other than  
 7 Mr. Sharma about this deposition, being deposed,  
 8 or --  
 9 A I had -- I was at a basketball game, and  
 10 I spoke with Ms. Pope-Brown.  
 11 Q Okay.  
 12 A Yeah. And I told her that I had a  
 13 deposition coming up. And she told me that she had  
 14 already done it.  
 15 Q Okay.  
 16 A Yeah.  
 17 Q When -- do you remember approximately  
 18 what date you spoke to her at that game?  
 19 A I'm trying to remember what game that  
 20 was. Maybe about two or three weeks ago.  
 21 Q Okay.  
 22 A A girls baseball game.

21

10:32:30 1 Q Sometime in January, it sounds like?  
 2 A Yeah.  
 3 Q Okay.  
 4 A Yeah.  
 5 Q Did you-all discuss anything beyond just  
 6 that you had a deposition coming up and that she had  
 7 been deposed?  
 8 A No.  
 9 What she told me, though, was that --  
 10 because sometimes I can be a little moody. I'm not  
 11 going to kid you.  
 12 So she was just like, "Don't get upset  
 13 with the questions. Just" --  
 14 Q Got it.  
 15 A -- "stay cool."  
 16 And then she talked about the food, how  
 17 good the food was.  
 18 Q Oh, okay. That's great news.  
 19 A That's what we do together. We --  
 20 Q I gotcha.  
 21 A We go out to eat --  
 22 Q All right. Great.

22

10:32:57 1 A -- so --  
 2 Q So you haven't spoken with any lawyers  
 3 for Prince George's County?  
 4 A No.  
 5 Q Okay. Did you bring any documents with  
 6 you today?  
 7 A The subpoena.  
 8 Q Okay. Okay. Great.  
 9 Did you do any other preparation for this  
 10 deposition?  
 11 A No.  
 12 Q Okay.  
 13 A Just got dressed and tried to look a  
 14 little cute.  
 15 Q How did you --  
 16 A And I do.  
 17 Q I mean, I don't know it's appropriate for  
 18 me to comment, but you look very professional.  
 19 A Thank you.  
 20 Q Thank you for being here.  
 21 A I don't feel Me Too'd. I feel great.  
 22 It's all good.

23

10:33:32 1 Q Okay. How did you learn Ms. Eller was  
 2 suing Prince George's County? Do you remember?  
 3 A I cannot remember. Someone must have  
 4 told me, because otherwise I wouldn't have been  
 5 looking for the article; so --  
 6 Q Okay.  
 7 A Someone must have told me, but it's been  
 8 a long time.  
 9 Q Was that the article in the Washington  
 10 Post? Do you remember?  
 11 A I'll have to look at my phone to see  
 12 where it was. But I remember Googling  
 13 "Jennifer Eller" and then the case coming up.  
 14 Jennifer dressed with the pretty red dress, that  
 15 one, that article.  
 16 Q Yeah, I think that might have been --  
 17 Okay. Have you spoken to anyone else  
 18 about Ms. Eller's lawsuit?  
 19 A No.  
 20 Q Okay.  
 21 All right. Now, I'm --  
 22 A I'm not at the same school anymore; so --

24

10:34:11 1 Q I do know that.  
 2 A -- no one knows her.  
 3 Q Yeah.  
 4 A Yeah.  
 5 Q Yeah, I did know that.  
 6 A Yeah.  
 7 Q And we'll get to that in just a minute.  
 8 So I'm going to through some questions  
 9 now about you and about your background.  
 10 A Okay.  
 11 Q So this will be a change of topic.  
 12 A Okay.  
 13 Q Okay. So where did you go to high  
 14 school?  
 15 A I went to high school at Friendly High  
 16 School. And then --  
 17 Q Oh, really?  
 18 A Yes. Uh-huh.  
 19 And then I transferred and finished at  
 20 Crossland High School.  
 21 Q Crossland?  
 22 A Crossland, uh-huh.

25

10:34:34 1 Q And that's also in PGCPs?  
 2 A Uh-huh. It's about maybe -- yeah, one  
 3 city over. Actually, maybe 5 miles away from  
 4 Friendly.  
 5 Q Great.  
 6 And what year did you graduate?  
 7 A 1985.  
 8 Q Oh, please.  
 9 A That's what I'm saying. Glowing skin.  
 10 Q Oh, my goodness. Okay.  
 11 A I'm going to stop playing around. I'm  
 12 serious.  
 13 Q Did you go to college? And if so, where  
 14 did you go?  
 15 A I went to Bennett College, very proud  
 16 Bennett Belle, down Greensboro, North Carolina.  
 17 Q All right.  
 18 A Graduated from there in '91.  
 19 You want me to go -- a degree in  
 20 accounting. I was an auditor for seven years.  
 21 Q I was just going to ask.  
 22 A Uh-huh.

26

10:35:09 1 Q Thank you for telling me.  
 2 A Yes.  
 3 Q And did you do graduate school after?  
 4 A Yes. Because when I left that job, I  
 5 went into teaching. And I started in DC Public  
 6 Schools. I got a master's at Bowie State in  
 7 elementary education, and then another master's in  
 8 reading education.  
 9 Q Oh, wow.  
 10 A And then a master certification in Pupil  
 11 Personnel.  
 12 Q I was just going to ask if you had any  
 13 certifications.  
 14 A Uh-huh.  
 15 Q Can you tell me more about the Pupil  
 16 Personnel certification.  
 17 When did you obtain that?  
 18 A When did I finish that? It would have  
 19 been 11 years ago, because I started the job  
 20 13 years ago.  
 21 Q If I can do math, that would be --  
 22 A Yeah.

27

10:35:46 1 Q -- 2009?  
 2 A Yes.  
 3 Q Okay.  
 4 A That sounds very right.  
 5 Q 2008? 2009?  
 6 A Uh-huh.  
 7 Q Okay. And what -- can you tell me what  
 8 that certification -- what did they require you to  
 9 do to obtain that certification?  
 10 A So for me -- what they do at Prince  
 11 George's County Schools -- I was already a certified  
 12 teacher.  
 13 Q Right.  
 14 A So they review your transcript to tell  
 15 you what classes you would need in order to be  
 16 certified to become --  
 17 Q I see.  
 18 A -- a pupil personnel worker. So I had to  
 19 take five additional classes.  
 20 Q And where -- did you have to take those  
 21 through a local university?  
 22 A Oh, yeah. I'm sorry.

28

10:36:13 1 Q That's okay.  
 2 A I went to Trinity.  
 3 Q Oh, Trinity.  
 4 A Yeah.  
 5 Q Okay.  
 6 A I went to Trinity to do those.  
 7 Q I'm going to back up just a minute.  
 8 Ms. Isom.  
 9 A Sure.  
 10 Q I forgot to ask the years that you  
 11 obtained your two master's degrees?  
 12 A 2001 and 2000- -- let me see. 2010.  
 13 Q Okay.  
 14 A 2010.  
 15 Q And can you specify for me, the 2001  
 16 master's was the --  
 17 A Was the --  
 18 Q -- In elementary --  
 19 A Yeah, elementary education.  
 20 Q Okay. And the second one was in reading?  
 21 A Reading education.  
 22 Q Okay. And as a part of the curriculum

29

10:36:58 1 for either of those master's, did you have to take  
 2 any courses about diversity, inclusion?  
 3 A Oh, yeah. Yes, there's a lot of classes  
 4 like that. Especially when you're going to pupil  
 5 personnel, you take -- it's a class on culture.  
 6 There is, of course, the class on special education.  
 7 And there was one more.  
 8 It's a couple of classes like that,  
 9 development and -- oh, like, mental hygiene.  
 10 Q Okay.  
 11 A I had to take mental hygiene.  
 12 Q Okay.  
 13 A I had to think for a moment. Yeah.  
 14 Q As a part of --  
 15 A I do -- for adolescents.  
 16 Q Of course.  
 17 A That's -- it was a class that -- it was  
 18 something like that. Mental hygiene for adolescent,  
 19 like that.  
 20 Q As a part of any of those classes, do you  
 21 recall any instruction specifically about young  
 22 people and LGBTQ identity?

30

10:38:15 1 Q Oh, interesting.  
 2 A Yeah, it did.  
 3 Q Okay.  
 4 A It did. It covered -- yeah.  
 5 Q In the context of antidiscrimination  
 6 law --  
 7 A Yeah.  
 8 Q -- perhaps?  
 9 A Yes.  
 10 Q Okay.  
 11 A Absolutely.  
 12 Q And that certification --  
 13 A And then the rights have changed so much  
 14 even since --  
 15 Q Oh, yeah.  
 16 A -- then. Yeah.  
 17 Q And that was 2008, 2009 --  
 18 A Yeah.  
 19 Q -- right?  
 20 A It was a long time ago.  
 21 Q Okay. As a part of your position as a  
 22 PPW, do you have to, like, recertify every so often,

32

10:37:42 1 A To be honest with you --  
 2 Q I know it's been --  
 3 A -- I can't --  
 4 Q -- a number of years.  
 5 A Yeah. I was going to say, I cannot  
 6 remember.  
 7 Q Okay.  
 8 A Honestly, I can't remember.  
 9 Q Okay. No problem.  
 10 Okay. And then Trinity College, you took  
 11 the five courses. And as a part of that  
 12 certification, you said it involved culture, mental  
 13 hygiene?  
 14 A Yes.  
 15 School law.  
 16 Q "School law."  
 17 A School law. That was my master -- that  
 18 was the certification for becoming a pupil personnel  
 19 worker.  
 20 Q Okay.  
 21 A And that class did cover the rights of  
 22 LGBTQ.

31

10:38:35 1 or is that --  
 2 A Oh, yeah.  
 3 Q -- certification good --  
 4 A No. No. No. No.  
 5 Q Okay.  
 6 A It's just like the education. You have  
 7 to do it every five years.  
 8 Q Okay. So --  
 9 A Uh-huh. And whatever you do, it covers  
 10 both of my certifications. The elementary education  
 11 and the pupil personnel.  
 12 Q Oh.  
 13 A Yeah.  
 14 Q Okay. So you don't have to double up;  
 15 right?  
 16 A I don't have to double up.  
 17 Q Okay. So when was the last -- so maybe  
 18 the last re-up you did was 2015? The recert?  
 19 A No. It was just -- it was more recent  
 20 than that.  
 21 Q Oh, okay.  
 22 A Because I have to do it again right

33

10:39:03 1 before I turn 55; so it would have been two years  
 2 ago.  
 3 Q Two years ago?  
 4 And as a part of that recertification, do  
 5 you remember the courses you had to take or the --  
 6 A It was about -- something about classroom  
 7 environment. Like, controlling -- it was more like  
 8 a teacher behavior class.  
 9 Q I see.  
 10 A I did that online.  
 11 Q Okay.  
 12 A Yeah.  
 13 Q Perfect.  
 14 So now we're going to talk -- I'm going  
 15 to ask you some questions about your work  
 16 experience --  
 17 A Sure.  
 18 Q -- which I know a little bit about. But  
 19 it sounds like there's probably more given how long  
 20 you've been in education.  
 21 A Uh-huh.  
 22 Q So let's start -- was there ever a time

34

10:39:39 1 where you were working for someone that was not  
 2 Prince George's County Public Schools?  
 3 A Yes.  
 4 Q Okay.  
 5 A I worked for the National Science  
 6 Foundation. That's where I was an auditor.  
 7 Q Oh, right.  
 8 For seven years?  
 9 A Uh-huh.  
 10 Q Okay.  
 11 A And then I worked for DC Public Schools.  
 12 That's how I started teaching.  
 13 Q Oh, great.  
 14 A Uh-huh.  
 15 Q And what was your first -- so -- sorry.  
 16 Auditor for seven years --  
 17 A Uh-huh.  
 18 Q -- for the --  
 19 A I've been everywhere. I was a  
 20 hairdresser.  
 21 Q -- National Science Foundation?  
 22 A National Science Foundation was the

35

10:40:04 1 auditor.  
 2 Q Okay.  
 3 A And then DC Public Schools is where I  
 4 started teaching.  
 5 Q Great.  
 6 A And then I went to PG County Schools --  
 7 Q Okay.  
 8 A -- and taught. And then -- so I've  
 9 taught for ten years altogether.  
 10 Q How long were you at DC Public Schools?  
 11 A Four years.  
 12 Q "Four years."  
 13 And what was your position there?  
 14 A I was a classroom teacher, fourth and  
 15 fifth grade.  
 16 Q Do you remember what years that was  
 17 between?  
 18 A Nineteen -- I'll never forget.  
 19 Q Oh.  
 20 A 1997. My father died --  
 21 Q Oh, I'm sorry.  
 22 A -- right after I started.

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10:40:25 1 Q Oh, my goodness. I'm so sorry.  
 2 A Why?  
 3 He was my encouragement to become a  
 4 schoolteacher.  
 5 Q Yeah.  
 6 A I'm sorry.  
 7 Q That's okay. Let me get you a --  
 8 A I'm all good. No. I promise you.  
 9 Q Do you need a tissue?  
 10 A I have to --  
 11 Q Okay.  
 12 A I just didn't expect the question.  
 13 Q Oh, yeah.  
 14 A I'm good.  
 15 Q Okay. Well, that's a really meaningful  
 16 reason to get into teaching.  
 17 A Yes.  
 18 Q Thank you for sharing that.  
 19 A I'm sorry.  
 20 Q That's okay.  
 21 We can take a minute if --  
 22 A Uh-uh. I promise you, I can pull myself

37

10:40:49 1 together.  
 2 Q Okay.  
 3 A I'm not -- yeah.  
 4 Q So you said that would be '97 to 2001?  
 5 A Yes.  
 6 Q Okay.  
 7 A That's exactly -- yeah.  
 8 Q And you were a fourth and fifth grade  
 9 teacher?  
 10 A Yeah. I did fourth grade, and then I did  
 11 fifth.  
 12 Q And can you just tell me a little bit  
 13 about -- I think I generally know, but can you tell  
 14 me a little bit about what your role was as a  
 15 fourth and fifth grade classroom teacher?  
 16 Did you have a specific subject, or did  
 17 you --  
 18 A No. At first, fourth grade -- no. In  
 19 DC, I taught all the subjects; so you taught -- I  
 20 taught --  
 21 Q Oh, that's right.  
 22 A -- all the --

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10:41:15 1 Q Because you had --  
 2 A -- core --  
 3 Q -- grade levels.  
 4 A Yeah. I had --  
 5 Q Okay.  
 6 A Yeah. So I had fourth and fifth grade.  
 7 And you teach reading, math, social studies,  
 8 science. You do all that there.  
 9 Q Gotcha.  
 10 A Yeah.  
 11 That was there. It was different in  
 12 PG County.  
 13 Q And just out of curiosity, when you were  
 14 in DC Schools, did they have professional  
 15 development for you-all --  
 16 A Yes.  
 17 Q -- as you -- as you were working through  
 18 your four years there?  
 19 A Yes. It was -- yeah. We would -- it  
 20 would be mostly about grading, classroom culture.  
 21 You know, just basically going over the rules and  
 22 things like that; so it was more like that.

39

10:41:48 1 Q Makes sense.  
 2 A Yeah.  
 3 Q And any -- and, again, I know this is a  
 4 number of years ago, but any specific instruction  
 5 from DC Public Schools about LGBT students or  
 6 bullying or any kind of those topics that you  
 7 remember?  
 8 A I cannot remember --  
 9 Q No problem.  
 10 A -- honestly.  
 11 Q Okay. So thank you for that.  
 12 So after DC Public Schools in 2001, is  
 13 that when you started at Prince George's County?  
 14 A Yes. I went straight there. Uh-huh.  
 15 Q Okay. And what was your first -- so I'm  
 16 guessing that would be 2002?  
 17 A No. That was still 2001.  
 18 Q Oh, 2001.  
 19 A So 2001 --  
 20 Q 2001.  
 21 A Yeah. Exactly.  
 22 Q Gotcha. Okay.

40

10:42:33 1 A I started the day before September  
 2 the 11th.  
 3 Q I was just going to ask.  
 4 A It was the day before. Because I had to  
 5 have surgery; so I didn't start at the beginning of  
 6 the year.  
 7 Q Oh, wow.  
 8 A And I went to work for one day. And the  
 9 next day, September the 11th -- it's funny how --  
 10 that's like a landmark of that --  
 11 Q I think --  
 12 A -- event.  
 13 Q -- for many people, it really is.  
 14 A Yeah. Yeah.  
 15 Q I very much remember where I was as well.  
 16 A Uh-huh.  
 17 Q That's how I knew it was the fall.  
 18 A Yeah.  
 19 Q So you would have been starting a new  
 20 school.  
 21 A Yeah. Uh-huh.  
 22 Q Okay. So you --

41

10:42:58 1 A That's absolutely true.  
 2 Q You started at PGCPs as a classroom  
 3 teacher.  
 4 A Yes.  
 5 Q Were you teaching also fourth and  
 6 fifth grade?  
 7 A No. I got put in third grade.  
 8 Q "Third grade."  
 9 Okay. And what school were you at?  
 10 A I was at Morningside Elementary School.  
 11 Q "Morningside."  
 12 A I don't think it exists anymore. I think  
 13 it's a charter school now.  
 14 Q How long were you there at Morningside?  
 15 A At Morningside, I was there two years.  
 16 Q Two years?  
 17 Okay. And were your duties similar there  
 18 as when you were at -- in DC Public Schools?  
 19 A Yes. But in PG County, you do two  
 20 subjects; so I was reading and social studies. And  
 21 then the kids switched classes.  
 22 Q Okay. And --

42

10:43:38 1 A It's better to prepare.  
 2 Q -- Ms. Isom, I'm sorry. I forgot to ask.  
 3 Which -- were you at the same school when you were  
 4 in DC Public Schools?  
 5 A Yeah. Stayed at the same school, Stanton  
 6 Elementary.  
 7 Q "Stanton Elementary."  
 8 A Uh-huh.  
 9 Q Great.  
 10 A That doesn't exist now either.  
 11 Q It doesn't exist now?  
 12 A That's a charter school.  
 13 Q Oh, wow.  
 14 A Yeah.  
 15 You know, DC turned very charter.  
 16 Q Very charter.  
 17 A Yeah.  
 18 Q Yeah. Over the last 20 years --  
 19 A Uh-huh.  
 20 Q -- that's true.  
 21 Okay. So let's go position by position  
 22 with Prince George's County Public Schools.

43

10:44:02 1 A Okay.  
 2 Q So you were two years at Morningside?  
 3 A Yes.  
 4 Q And then after Morningside, where did you  
 5 go?  
 6 A Two years at Francis Scott Key. And then  
 7 two years at Massie Elementary School. And then I  
 8 got promoted to this position.  
 9 Q Tell me that third school. Massie?  
 10 A Samuel P. Massie.  
 11 Q "Samuel P. Massie."  
 12 A Uh-huh.  
 13 Q Okay. And it was two years at each  
 14 school?  
 15 A Yes.  
 16 Q And then after Massie, you went to  
 17 Friendly High?  
 18 A I went to Friendly High School as a pupil  
 19 personnel worker.  
 20 Q At --  
 21 A No. No. I'm sorry. I went to --  
 22 Q That's okay. Take your time.

44

10:44:33 1 A -- Dr. Henry Wise as a pupil personnel  
 2 worker, high school.  
 3 Q Was that your first --  
 4 A That was my first as a PPW.  
 5 Q Got it.  
 6 A Yes.  
 7 Q So you were a classroom teacher --  
 8 A Uh-huh.  
 9 Q -- at those three schools?  
 10 A Yes.  
 11 Q All right. So let's go back to -- tell  
 12 me the second school after you left Morningside.  
 13 A So the second school I went to was  
 14 Francis Scott Key --  
 15 Q Okay.  
 16 A -- Elementary School.  
 17 Q And what grade were you teaching there?  
 18 A There, I went fourth grade. And then I  
 19 followed my class. My principal wanted me to stay  
 20 with the same kids; so I went to fifth.  
 21 Q Okay. And how long did you stay there?  
 22 A Just the two years.

45

10:45:50 1 Q So you left at what -- on what date --  
2 what year, approximately?  
3 A Okay. That would have been two, three,  
4 and then four -- 2005.  
5 Q So in 2005, you left and went to Massie?  
6 A Massie.  
7 Q Okay. And at Massie, what --  
8 A I taught fifth grade.  
9 Q "Fifth grade."  
10 A Uh-huh. And I was a grade-level chair.  
11 Q Okay. Tell me what that means, a  
12 "grade-level chair."  
13 A That means, for fifth grade, I would be  
14 the lead teacher, so I would be the one who would go  
15 to the meetings. And then, like, when we have --  
16 you have to have grade-level meetings, so I would  
17 chair those and let them know what was new and  
18 coming up, or whatever, like that.  
19 Q Great.  
20 And you said at Massie you were only  
21 teaching two subjects.  
22 A Yes.

46

10:46:48 1 Q And what two subjects were those again?  
2 A Reading and social studies.  
3 Q Okay. Now, sort of thinking about those  
4 three positions as a classroom teacher --  
5 A Uh-huh.  
6 Q -- do you remember any training or  
7 instruction or professional development specifically  
8 related to LGBT students, bullying?  
9 A I can't say that I remember. I can't say  
10 that I remember. I can't say that it didn't happen,  
11 but I can't say it -- that I remember.  
12 Q No problem. Thank you.  
13 A Uh-huh.  
14 Q So then you stayed at Massie from 2005 to  
15 2007?  
16 A Yes.  
17 Q And in 2007, where did you go?  
18 A That's when I became a pupil personnel  
19 worker for Dr. Henry Wise High School.  
20 Q Dr. Henry Wise, W-I --  
21 A Dr. Henry Wise Jr. High School.  
22 Q Okay.

47

10:47:54 1 Okay. And so that would have been your  
2 first PPW job --  
3 A Yes.  
4 Q -- in 2007?  
5 A Uh-huh.  
6 Q Can you describe to me -- and this will  
7 be a little repetitive later on, but can you  
8 describe to me the duties, as you understood them,  
9 of the PPW position when you took it --  
10 A Yes.  
11 Q -- in 2007?  
12 A So in parentheses is the word social  
13 worker.  
14 Q Okay.  
15 A And so it has so many different facets to  
16 it.  
17 So, basically, you're a student advocate,  
18 And with the code of student conduct, you would make  
19 sure the students' rights were not violated in that  
20 way.  
21 So I did conduct the code of student  
22 conduct. They do an assembly per grade level every

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10:48:36 1 quarter. And then they sign an agreement of -- you  
2 know, of the bigger violations, the -- the  
3 expellable offenses. They sign a waiver for that.  
4 So I do that.  
5 But if students have significant -- well,  
6 let's say a more egregious violation of the code,  
7 then we have two different kinds of suspensions.  
8 The school may request an extended suspended, which  
9 is a suspension anywhere from 11 to 45 days. And  
10 that decision is made by me how many days the  
11 students will be out. It's also made by me whether  
12 or not -- whether or not -- because they request it;  
13 so I have to make a semi-approval depending on the  
14 thing.  
15 With an extended suspension, it stays --  
16 the suspension stays with me. With an expulsion, I  
17 still have to say that the -- that you have grounds  
18 for it, basically. And then I do a report, and I  
19 forward that to the board of education where the  
20 final decision is made.  
21 Attendance. I'm also responsible for  
22 attendance. I go to houses and knock on doors of

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10:49:38 1 students that have been out too many days or where  
 2 I'm concerned about certain things going on. That's  
 3 the social workery side.  
 4 And if I can't get the attendance  
 5 approved, I refer them to an inner agency who might  
 6 refer them to court for the violation. It depends.  
 7 We stop at interagency to see where -- who -- where  
 8 the fault lies.  
 9 Okay. There's so many parts to this job  
 10 that it's so hard to explain.  
 11 Q It's okay. No. No.  
 12 A But I get to explain it to you guys.  
 13 Q Do take your time, and don't feel that we  
 14 are in any kind of rush.  
 15 A Yeah, rush.  
 16 So also -- so, then, also the social  
 17 workery side is I find resources for families and  
 18 children, whether it's means for taking care of the  
 19 family, like food or clothing, those sorts of  
 20 things, or whether it's social or emotional things.  
 21 I might refer them to Family Preservation if there's  
 22 an issue with the family, or different programs.

50

10:51:26 1 So it's training such as that. It's a  
 2 lot of training about people.  
 3 Q And how -- that sounds like a very  
 4 involved job.  
 5 A Yeah, it is. It is. It's driving us  
 6 crazy, to be honest. It is. But we love it because  
 7 that's where your heart is.  
 8 Q Of course. Of course.  
 9 A Uh-huh.  
 10 Q How many PPWs were in each school? Was  
 11 there one per school?  
 12 A You have -- yes. And you have several  
 13 schools. You have -- yeah. So when I had Wise, I  
 14 was there by myself. And that school is almost  
 15 3,000 students; so that was the only school I had.  
 16 Q Okay.  
 17 A But then I went to Friendly. And I had  
 18 Friendly, and I had three other schools. And that's  
 19 how my situation is now too.  
 20 Q I see. Okay.  
 21 A Yeah. Yeah, you're busy.  
 22 Q Yeah.

52

10:50:32 1 Just referrals for counseling and those sorts of  
 2 things.  
 3 Q Okay.  
 4 A Uh-huh.  
 5 Q Thank you very much for that.  
 6 A Uh-huh.  
 7 Q So did you -- while you were at Dr. Wise  
 8 Jr. High School, do you remember receiving any  
 9 training related to diversity and inclusion issues?  
 10 A Now, that's more like when the training  
 11 absolutely starts, because we meet every month, the  
 12 PPWs. And we have training on all different types  
 13 of things. But a lot of it is dealing with those  
 14 things like that, the issues that would lead to  
 15 bullying --  
 16 Q I see.  
 17 A -- let me say it like that.  
 18 Sensitivity trainings, we definitely have  
 19 that.  
 20 Then we have training also on, you know,  
 21 what is expected of us, because we basically have to  
 22 do a lot of reporting.

51

10:52:10 1 A Yeah, you're busy.  
 2 Q That's no joke.  
 3 So the training that you were just  
 4 talking about --  
 5 A Uh-huh.  
 6 Q -- that you-all received, which sounds  
 7 very extensive, was just for pupil personnel  
 8 workers?  
 9 A Yes. Most of -- yeah.  
 10 Q That was not -- not all the staff of  
 11 Dr. Wise Jr. were invited?  
 12 A No. No. Uh-uh. No. That's just  
 13 monthly. We do that -- every month we have that  
 14 particular training.  
 15 Q Okay.  
 16 A At the beginning, we would have  
 17 training -- they called it the "P-Team." And it was  
 18 the pupil personnel workers and the guidance  
 19 counselors and the school psychologists. And there  
 20 was one other -- oh, the parent liaisons. So we had  
 21 this big training at least like two or three times a  
 22 year.

53

10:52:54 1 Q Okay. That included more people. But  
 2 the --  
 3 A Yeah.  
 4 Q -- trainings you were talking before were  
 5 just --  
 6 A Uh-huh.  
 7 Q -- PPWs?  
 8 A Just the PPWs.  
 9 Q Gotcha.  
 10 Sorry. Give me just a moment.  
 11 A No. Take your time, please.  
 12 Q And the -- so the training you were just  
 13 talking about, Ms. Isom, was that thinking about  
 14 sensitivity issues, diversity, you know, bullying,  
 15 those kind of things, as it related specifically to  
 16 students?  
 17 A Students, sometimes -- sometimes a little  
 18 bit of staff.  
 19 Q Okay.  
 20 A Sometimes a little bit of staff. Uh-huh.  
 21 Q Okay. Can you tell me more about that?  
 22 A As far as --

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10:54:29 1 year; so --  
 2 A Throughout the school year.  
 3 Q And so you -- do you remember, while you  
 4 were at Dr. Wise, a training -- at least one  
 5 training related to LGBT issues?  
 6 A With Wise? So I didn't go to the school  
 7 staff meeting, because -- okay. So let me --  
 8 Q Oh, no. I'm sorry.  
 9 A A PPW.  
 10 Q Just the PPW trainings.  
 11 A Yes. The PPW is not staff of the  
 12 school --  
 13 Q Got it.  
 14 A -- because it wouldn't work. Because if  
 15 a principal wants to request an expulsion and he's  
 16 also my boss, that would be problematic.  
 17 Q Sure.  
 18 A So I have to be independent. So my  
 19 office is pupil services.  
 20 Q Pupil services.  
 21 A Yes.  
 22 Q Right.

56

10:53:44 1 Q To the extent you remember.  
 2 No. That --  
 3 A No. No. No. Because it's still  
 4 ongoing.  
 5 Q Okay.  
 6 A Every year we have training. It's all --  
 7 it's all different cultures. I think that's the  
 8 word I want to use.  
 9 Some of the training will actually be  
 10 done by -- we've had, like -- gay and lesbian  
 11 organizations for the whole day might be -- that's  
 12 where the -- the trainings are themed. So,  
 13 therefore, it might be about diversity; so,  
 14 therefore, there would be an LGBT component of it.  
 15 It might be half the day; it might be the entire  
 16 day. It's just --  
 17 Q Gotcha.  
 18 A It varies.  
 19 Q And then -- sorry. I know you said, but  
 20 those trainings happened once a month?  
 21 A Yeah. They're every third Friday.  
 22 Q Every third Friday throughout the school

55

10:55:04 1 A But we just have an office within a  
 2 certain school.  
 3 Q I see.  
 4 A It's usually your high school where your  
 5 office is located.  
 6 Q Okay.  
 7 A And then they kind of, like, treat you  
 8 bad at other schools when you go visit. They kind  
 9 of, like, give you a student desk and a chair. I'm  
 10 serious.  
 11 Like, we don't -- "Can you" -- "Is that  
 12 comfortable? Are you fine over there?"  
 13 Seriously.  
 14 Q Oh, wow.  
 15 So the trainings for PPWs would happen at  
 16 pupil services?  
 17 A It would -- yeah. Well, pupil services  
 18 would organize it, but it would usually be at a --  
 19 one of our centers that has rooms available for --  
 20 Q Gotcha.  
 21 A -- training, because they're all over the  
 22 county.

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10:55:33 1 Q Gotcha.  
 2 A Yeah.  
 3 Q Okay. So while you were at Dr. Wise Jr.  
 4 High School --  
 5 A Uh-huh.  
 6 Q -- it sounds like probably at least once  
 7 you had an LGBT component training.  
 8 A Uh-huh.  
 9 Q Okay. Great.  
 10 And as a part of that training, did it  
 11 mostly focus on your advocacy work with students?  
 12 A Yes.  
 13 Q Okay.  
 14 A Because most of my work is with students.  
 15 Q Right.  
 16 A Like, if you ask me who the staff were at  
 17 any school, I really couldn't tell you a lot of the  
 18 teachers' names. I mostly work with the guidance  
 19 counselors and the administrators.  
 20 Q Okay.  
 21 A And students. Like, that's -- that is  
 22 who I'm always with is kids.

10:56:17 1 Q Okay.  
 2 A Yeah.  
 3 Q Okay. Thank you.  
 4 A Uh-huh.  
 5 Q How long were you at Dr. Wise Jr. High  
 6 School?  
 7 A I was there two years.  
 8 Q Okay.  
 9 A Uh-huh.  
 10 Q So now we're up to 2009?  
 11 A Yes. Yes.  
 12 Q So you -- when did you start at -- oh.  
 13 Sorry. Go ahead.  
 14 A In my head, I'm trying to put it  
 15 together.  
 16 I feel very roundabout-ish.  
 17 Q Okay.  
 18 A Okay.  
 19 Q So just tell me generally when you think  
 20 you started at Friendly.  
 21 A I can tell you.  
 22 Q Okay.

10:57:22 1 A So this is my fourth year at  
 2 Surrattsville. So that means that -- okay. So  
 3 let's say 2019, '18, '17, '16.  
 4 So Friendly would have been '11. 2011.  
 5 Q Okay.  
 6 A The September part of it.  
 7 Q Uh-huh.  
 8 A Uh-huh. So that's the school year, 2012,  
 9 actually. It goes by the graduation year, how they  
 10 name the year.  
 11 Q And in what position did you start?  
 12 A I was always a pupil personnel worker.  
 13 Q Okay.  
 14 A Yeah.  
 15 Q So you -- did you ever have any other  
 16 position when you were at Friendly?  
 17 A No.  
 18 Q Okay.  
 19 A At Friendly, was I ever -- no. No, I  
 20 didn't. Uh-uh.  
 21 Q And when did you --  
 22 A Let me take that back.

10:58:14 1 Q Oh.  
 2 A At Friendly -- and I still do it. I work  
 3 the basketball games and the football games.  
 4 Q Okay.  
 5 A Yeah. Yeah.  
 6 Q In what capacity? When you say "work,"  
 7 what do you mean?  
 8 A Just -- I work with -- in the booth a lot  
 9 of times. Or we keep order, basically.  
 10 Q Okay. So would you sort of -- would you  
 11 describe that as a chaperone?  
 12 A It's more -- yeah. It's more chaperoney.  
 13 But it's paid chaperoney. Let's make that clear.  
 14 Q Thank you for that distinction.  
 15 A Absolutely.  
 16 Q And what year did you stop working at  
 17 Friendly?  
 18 A I left Friendly in -- again, let me sec.  
 19 '18, '17, '16, '15 -- in June of '15.  
 20 Q Okay. Just a moment.  
 21 A No. Of '16.  
 22 Q June of '16?

10:59:06 1 A Of '16.  
 2 Q Okay.  
 3 A '17, '18, 19. Yeah, because it's my  
 4 fourth year.  
 5 Okay.  
 6 I hope these years are coming out right.  
 7 June of 2017, I would have left there.  
 8 No. '16. '16. '16. '16. I'm right. June of  
 9 '16. And I would have started -- yeah, I'm still  
 10 good.  
 11 Q Okay. So thinking about the training you  
 12 received between 2011 and 2016 --  
 13 A Uh-huh.  
 14 Q -- would you receive any training as a  
 15 PPW related specifically to transgender issues?  
 16 A Yes. And we did have a training --  
 17 Mr. Adams had a sensitivity training and -- on  
 18 LGBTQ, period. That's what it was. It was after  
 19 school, and it was just focusing on that. And that  
 20 was with the staff of PG County -- of Friendly High  
 21 School. He asked me to stay for that, and I stayed  
 22 for that particular training. Because, again, I

11:01:00 1 don't usually go to the staff training.  
 2 Q Right. Okay.  
 3 So thinking just about your PPW training  
 4 that you received --  
 5 A Uh-huh.  
 6 Q -- do you remember, between 2011 and  
 7 2016 -- you know, when you were talking about the  
 8 training specific to PPWs, did you receive training  
 9 from pupil services about transgender people,  
 10 students, staff?  
 11 A All of our training is from pupil  
 12 services; so that's who's doing it. My supervisor  
 13 is one of the directors in that department,  
 14 Jackie Naves.  
 15 Q Okay.  
 16 A And so all of our training was put  
 17 together by pupil services. And it's usually done  
 18 by us, honestly. Each -- there are cell groups  
 19 within the PPWs. And every month you're responsible  
 20 for the training, but the supervisor gives you the  
 21 topic.  
 22 Q Okay. So --

11:01:53 1 A Yeah.  
 2 Q -- it sounds like -- or let me clarify.  
 3 The trainings that happen through pupil services  
 4 were actually put on by the PPWs?  
 5 A Yes.  
 6 Q Okay. And it rotated who would --  
 7 A It rotated. Uh-huh.  
 8 Q Okay.  
 9 A For instance, I was with a group, and my  
 10 group was responsible -- I'm always in the group for  
 11 foster care.  
 12 Q Okay.  
 13 A Yeah, because I myself was a foster  
 14 parent for 11 years.  
 15 Q Oh, wow.  
 16 A Uh-huh.  
 17 Q Oh, wow.  
 18 A I need to be one again, but -- yeah.  
 19 Q Okay. Wow.  
 20 So -- sorry. Just to follow up again.  
 21 A Uh-huh.  
 22 Q Do you remember a training dedicated

11:02:30 1 through pupil services put on by the PPWs  
 2 specifically about transgender issues?  
 3 MR. SHARMA: Objection.  
 4 You can answer it again.  
 5 THE WITNESS: Go ahead?  
 6 Okay. So, yes. We -- yeah. We had --  
 7 it might be a segment of the day. Like, if we do a  
 8 sensitivity training, a segment of the day might be  
 9 LGBTQ issues.  
 10 BY MR. CHARLES:  
 11 Q Do you remember what year that training  
 12 was?  
 13 A Every year we -- we have some sort of  
 14 training that goes into LGBTQ issues.  
 15 Q Okay. So --  
 16 A The PPWs.  
 17 Q Okay.  
 18 A Uh-huh.  
 19 Q Okay. So within the subject, then, of  
 20 LGBTQ issues that happened yearly, do you  
 21 remember -- can you tell me what month?  
 22 A Oh, no.

11:03:32 1 Q Okay. Can you tell me -- what do you  
 2 remember from that LGBTQ training that happened each  
 3 year that focused on transgender issues?  
 4 A What do I remember?  
 5 Q From any of the years that -- that you  
 6 were at Friendly.  
 7 A For -- as a PPW, right?  
 8 Q Uh-huh.  
 9 A So we've had, you know, the discussions  
 10 that center on -- those were some of -- this is one  
 11 of the most -- the one that really caught my  
 12 attention the most, I would say. Not to say they  
 13 all didn't, but I'm saying, in particular,  
 14 understanding the differences within that community.  
 15 Like, you can't just say a person is gay.  
 16 There are so many different facets of -- you know  
 17 what I mean? People identify in different ways now.  
 18 How those different ways are very different, you  
 19 know, within that community.  
 20 And also, with -- identifying in that  
 21 community the issues that go on between the groups  
 22 in the -- in -- more like that. You know what I

11:04:52 1 mean? More like understanding that someone who is  
 2 being born the -- some people consider themselves --  
 3 I'm just giving an example.  
 4 Q Sure.  
 5 A -- to be born basically in the wrong  
 6 body. But some people who are gay don't consider  
 7 themselves to be born in the wrong body. They're  
 8 just -- you know.  
 9 And then it just -- all the different  
 10 bisexual relationships and things like that. So  
 11 just understanding the differences within that  
 12 community.  
 13 Q Okay.  
 14 A Do I remember it all? No. But I do  
 15 remember that I didn't realize how much diverse --  
 16 how much diversity was within the community. Yeah.  
 17 Q Do you remember any -- do you remember if  
 18 the training changed over the years that you were at  
 19 Friendly starting in 2011 and going until you left  
 20 in 2016?  
 21 A I -- I don't know. No.  
 22 Q Okay.

11:05:51 1 A I don't know. I don't know. I don't  
 2 know.  
 3 Since there was so much to learn within  
 4 that, I think that since we were doing it every  
 5 year, that, of course, we talked about different  
 6 subjects of it. But I wouldn't -- I wouldn't  
 7 necessarily be able to say that it changed in  
 8 intensity. But it -- you know what I mean? But we  
 9 just learned different things about -- you know.  
 10 Q Okay. Do you remember any specific  
 11 instruction about how to support transgender  
 12 students?  
 13 A Oh, yeah. Because the -- there's an  
 14 organization called SMYAL in DC. And they came and  
 15 did a training about, you know, dealing with  
 16 students. Because, see, in high school -- and this  
 17 is going back into my job.  
 18 In high school, students are really  
 19 starting to come into the reality of being what --  
 20 however they identify. And also, there are social  
 21 issues. So that's a lot.  
 22 What we had to do is deal with the issues

11:06:47 1 with family, because that's where the difficulty  
 2 with students come is coming out to their parents or  
 3 deciding to hide it from their parents.  
 4 So a lot of our -- remember, my training  
 5 is mostly student-focused. Good. Mostly  
 6 student-focused. So it would mostly be about how to  
 7 help students navigate that transition or discuss  
 8 with parents or --  
 9 Q Right.  
 10 A A lot of kids get thrown out of their  
 11 houses.  
 12 Q Right.  
 13 A It's all that kind of stuff that goes on.  
 14 So it's some real sad situations. Yeah.  
 15 Q Do you remember a specific instruction --  
 16 A It's always heavy.  
 17 Q -- about how to interact with transgender  
 18 colleagues as a PPW?  
 19 A I don't remember if it was specifically  
 20 that way. I think that what happens is whatever you  
 21 learn in those classes becomes in general. You know  
 22 what I mean? So even though --

11:07:42 1 Q They –  
 2 MR. SHARMA: Objection. She's not done  
 3 answering  
 4 THE WITNESS: Even though they're talking  
 5 about students, I mean, we can make the – you know,  
 6 we can make the crossover to adults as – the  
 7 training. Because if you have situations that you  
 8 know have – for instance, of Ms. Eller, it helps  
 9 you to be able to understand what they're going  
 10 through. You understand what I mean?  
 11 You want me to go on?  
 12 BY MR. CHARLES:  
 13 Q No. If you're finished, you can be –  
 14 A Yeah, I'm finished.  
 15 Q – finished.  
 16 Okay.  
 17 A Yeah.  
 18 Q But you don't remember specifically being  
 19 instructed about how to interact with transgender  
 20 colleagues?  
 21 A No.  
 22 Q When did the SMYAL-led training start?

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11:08:34 1 A It didn't start. They just came to a  
 2 particular training, and they did their training.  
 3 And I can't even tell you exactly when that was.  
 4 But I remember SMYAL came, because I got  
 5 a lot of information from them and took it back and  
 6 made it part of my display and gave it to the  
 7 guidance counselor so that they would have it.  
 8 And then SMYAL – when I was at Friendly,  
 9 SMYAL – I introduced SMYAL to a couple of students  
 10 who actually went – so SMYAL has, like, monthly, or  
 11 something like that, meetings in DC where youth come  
 12 together.  
 13 So that was the organization that I was  
 14 more familiar with in order to refer students.  
 15 Q Do you remember if SMYAL came every year  
 16 that you were –  
 17 A No. I--  
 18 Q – at Friendly?  
 19 A No. Remember, now, this isn't at  
 20 Friendly. This is at – for the pupil personnel  
 21 workers.  
 22 Q Okay.

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11:09:22 1 A I – yeah. So all my – my training is  
 2 done with the pupil personnel workers.  
 3 Q Do you remember if SMYAL came at least –  
 4 do you remember how often SMYAL came for the PPW  
 5 trainings?  
 6 A I just remember meeting them that one  
 7 time.  
 8 Q That one time.  
 9 A I don't – I can't – yeah. So – that  
 10 one particular time. Because, again, I got a whole  
 11 bunch of brochures and some contact information, was  
 12 able to make some contacts with students, with the  
 13 organization.  
 14 Q Great. Thank you.  
 15 Okay. What is that?  
 16 A No. Just the SMYAL website.  
 17 MR. SHARMA: And it's spelled S-M-Y-A-L,  
 18 just –  
 19 THE WITNESS: Yeah.  
 20 MR. SHARMA: – for the record.  
 21 BY MR. CHARLES:  
 22 Q So –

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11:10:19 1 A It's really good. It's a good  
 2 organization.  
 3 Q Since Friendly, since you left in June of  
 4 2016, where – what school have you been –  
 5 primarily –  
 6 A At Surrattsville.  
 7 Q – been?  
 8 I'm sorry. Say that again.  
 9 A Surrattsville.  
 10 Q And can you spell that?  
 11 A Yes. S-U-R-R-A-T-T-S-V-I-L-L-E. Let me  
 12 write it down.  
 13 Q No. That's okay.  
 14 Oh, you're just checking. Okay.  
 15 A Yes, I got it.  
 16 Q Great.  
 17 And what's your position there?  
 18 A I'm still a pupil personnel work. I'm  
 19 retiring from this one.  
 20 Q Congratulations.  
 21 A Yeah. Well, I don't know when.  
 22 Q Okay.

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11:10:52 1 A But it's a nice small environment. It's  
 2 a good place to settle down.  
 3 Q So you started -- can you tell me the  
 4 fall that you started there?  
 5 A Oh, my -- oh, I wrote it down. 2015.  
 6 No. I'm sorry. I'm wrong.  
 7 2017.  
 8 Q Okay.  
 9 A 2017.  
 10 Q Okay.  
 11 A Yes.  
 12 Q And that's been -- has that been the only  
 13 position you've been in since Friendly?  
 14 A Yes. Yes. Again, still working the  
 15 basketball games, but --  
 16 Q Gotcha.  
 17 A I do a tutoring program on Saturday  
 18 mornings.  
 19 Q But also at Surrattsville?  
 20 A Surrattsville. Just the pupil personnel  
 21 worker.  
 22 Q So going forward, as you may have

11:11:47 1 guessed, most of my questions will be limited to  
 2 your time at Friendly --  
 3 A Okay. Sure.  
 4 Q -- so from the fall of 2011 to the summer  
 5 of 2016, which I will represent to you is the period  
 6 of time that Ms. Eller was also employed at  
 7 Friendly.  
 8 A Uh-huh.  
 9 Q So keep in mind that time frame.  
 10 A Yes.  
 11 Q And I'll let you know if my question is  
 12 meant to relate to a different time.  
 13 A Okay.  
 14 Q When did you first come to know about  
 15 Ms. Eller?  
 16 A The first year I was there. Me and  
 17 Ms. Eller started the same year. And so -- I don't  
 18 remember if I saw Ms. Eller before this, but --  
 19 Mr. Adams was the principal at the time, Mr. Raymah  
 20 Adams. And Mr. Adams would ask me to -- and I don't  
 21 know why because he had just met me himself, but for  
 22 some reason he chose me.

11:12:41 1 And he would say, "There's a teacher,  
 2 Ms. Eller. And she's having a difficult time here  
 3 getting comfortable here at this school," because as  
 4 you can imagine, in all honesty, we have a  
 5 transgender teacher and children.  
 6 So when she first got there, she was  
 7 having some issues with kids not being kind. And so  
 8 he sent me around there to support her and basically  
 9 make here feel more comfortable at the school.  
 10 Uh-huh. And that happened -- that  
 11 happened several times, and definitely every year.  
 12 Q Sorry. What do you mean by "that  
 13 happened several times"?  
 14 A Well, Ms. Eller -- I hate doing this  
 15 because I feel like I'm talking about Ms. Eller, and  
 16 I like Ms. Eller. But that's what I'm supposed to  
 17 do, right?  
 18 So she also suffered with anxiety. She  
 19 had an issue with anxiety. So sometimes her anxiety  
 20 would be -- I remember one time in particular her  
 21 anxiety was very high, and I didn't know. And  
 22 Mr. Adams sent me around there to go talk to

11:13:44 1 Ms. Eller. And Ms. Eller was really -- she was  
 2 really quite anxious.  
 3 And so I would talk her through it and,  
 4 like, give suggestions. And I really didn't know if  
 5 they were the right ones. But me and Ms. Eller  
 6 would just communicate in that way.  
 7 And so that -- that particular time, if  
 8 you -- if you want me to go into that, that  
 9 particular time she was very -- she was physically  
 10 anxious. And I asked her if she had talked to her  
 11 therapist about how she was feeling.  
 12 And then I probably made the wrong  
 13 suggestion, because I don't know what I'm talking  
 14 about, but I like Ms. Eller. And I said, "See" --  
 15 "like, your medication, maybe you need to change the  
 16 dosages," or something like that. I mean, we had  
 17 that kind of conversation.  
 18 Q Okay.  
 19 A Yeah.  
 20 Q Did you hear about Ms. Eller before she  
 21 came to work at Friendly?  
 22 A Uh-huh.

11:14:33 1 MR. SHARMA: Is that a "no"?

2 THE WITNESS: That's a "no." That's a

3 "no."

4 Thank you.

5 MR. SHARMA: No problem.

6 BY MR. CHARLES:

7 Q Did you know Ms. Eller was transgender

8 before she started working at Friendly?

9 A I didn't know Ms. Eller before she

10 started working at Friendly. Uh-huh.

11 Q So you didn't know she was transgender?

12 A No.

13 Q Just a yes or no. I'm sorry.

14 A Yes, I knew that she was -- once I --

15 Q Before -- before she started working?

16 A No.

17 Q Okay.

18 A Not until we got to Friendly, because I

19 didn't know her.

20 Q Okay. Thank you.

21 A Right. Uh-huh.

22 Q After you learned that Ms. Eller was

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11:15:06 1 transgender, do you remember telling anyone else

2 that she was transgender?

3 A No, I don't. I mean, I can't remember if

4 Mr. Adams expressed that it was a transgender

5 teacher. He probably told me that a transgender

6 teacher is having a difficult time. I can't imagine

7 that he wouldn't explain that to me before he sent

8 me around there. So more than likely he had -- had

9 told me that the teacher was transgender.

10 Q Sorry. I need to back up a little bit.

11 A Sure.

12 Q When did you learn Ms. Eller was

13 transgender?

14 A When I met her.

15 Q And how did you learn she was

16 transgender?

17 A Again, through that conversation with

18 Mr. Adams sending me around there to support her.

19 Q And how did you react when you learned

20 this information?

21 A In my mind, I felt that -- and this was

22 in my mind -- that a teacher would have a difficult

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11:15:58 1 time starting out at a school transgender because of

2 the children. Because, quite honestly, kids don't

3 always handle, you know, differences until they get

4 used to it. Uh-huh.

5 That leads to a question. Go ahead. I'm

6 ready.

7 Q Why did you feel like she would have a

8 hard time at Friendly?

9 A Because I know that being transgender is

10 difficult because -- I mean, you see it. So you

11 know that people have a difficult time -- and

12 then -- okay. So I went to hair school. I went to

13 cosmetology school. And in cosmetology school,

14 there are a lot of gay men. And I could see what

15 they would go through when we would hang out at

16 lunchtime and stuff like that, like the staring or

17 somebody saying something super negative to them.

18 And these were adults on 16th Street -- 16th and

19 K Street. So I could see that's what happened.

20 I had one particular friend -- he was

21 killed. But I had one particular friend, and he

22 wore women's clothes. But at that time, you

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11:16:59 1 couldn't go into the women's dressing room to try on

2 clothes.

3 So I had a friend named Terry who was his

4 exact size. So if he was shopping, he'd be like, "I

5 want you to go try this outfit on for me." And we

6 would go, like, shopping in that way. You know what

7 I mean? So -- but I know that there was difficulty.

8 And I remember one time somebody saying

9 something super negative to him, and we all got into

10 this big argument at lunchtime with this group of

11 people that we didn't know. We were 18 at the time.

12 And I remember that there was a lot of difficulties

13 for that student. Uh-huh. I mean, for that --

14 well, that student at the cosmetology school.

15 And then when I went to work, of course,

16 there were gay men there. One person's name was --

17 they called him Ms. Tyrone. You can look it up on

18 the Internet. He got into a real bad car accident.

19 And when the firemen were there and doing -- they

20 were supposed to be doing the lifesaving thing.

21 They backed up and said, "Oh, my, God." I mean,

22 like, everybody was standing around. There was so

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11:17:54 1 many people around who got upset.  
 2 The firemen stopped doing lifesaving,  
 3 whatever – what – the word I should say. And they  
 4 stopped trying to administer help to this person,  
 5 and he died.  
 6 His name was Ms. Tyrone. You can look it  
 7 up. And he worked with me in the hair salon and –  
 8 beautiful. Absolutely gorgeous. Dressed as a  
 9 woman, totally transgender.  
 10 But I remember that I was so hurt by  
 11 knowing that that's how they died. They could hear  
 12 it. He could – he could hear – she, well, could  
 13 hear the whole thing and was dying.  
 14 So that's how Ms. Tyrone went out of  
 15 life. And she was so wonderful and so happy and  
 16 so – you know, she was a lot of fun. Like, she was  
 17 like – excuse my language, when you come in, she's  
 18 like, "What's up, bitch?" Like that.  
 19 And that was before women were going  
 20 around calling each other names like that. But it  
 21 was so crazy. And I loved the energy and to know  
 22 that this person – why am I having an emotional day

11:18:53 1 in here? They -- I know that this person went out  
 2 hearing those things and hearing – and feeling the  
 3 people stopping trying to help her as if she didn't  
 4 matter.  
 5 The family sued. I did follow that  
 6 story. The family sued and got a million dollars  
 7 from DC government. Uh-huh.  
 8 Q Yeah. I'm familiar with that story.  
 9 A Yes.  
 10 Q That's really heartbreaking.  
 11 A Yes. I knew Tyrone.  
 12 Q Yeah.  
 13 A Uh-huh. I knew Tyrone.  
 14 Q So given your experience and knowledge in  
 15 your personal life –  
 16 A Uh-huh.  
 17 Q -- what about Friendly High School made  
 18 you worried for Ms. Eller?  
 19 A Just because of what I had seen. And so,  
 20 now, these are children. So I knew that -- I didn't  
 21 feel that -- that -- like what Ms. Tyrone went  
 22 through was going to happen or anything like that.

11:19:40 1 But I know that the children would be –  
 2 children can be mean. So I knew that experience and  
 3 that difference for them, because they're not used  
 4 to it either, that they would respond to Ms. Eller  
 5 in that – in a way that might not be positive. For  
 6 sure.  
 7 Q After you learned Ms. Eller was  
 8 transgender, did you tell anyone about her being  
 9 transgender that you remember?  
 10 A Not about her being transgender. But I  
 11 did have to go back to Mr. Adams, because Mr. Adams  
 12 wanted to know is everything okay, you know, that  
 13 sort of thing; so – you know.  
 14 Just checking on her well-being as far as  
 15 that. And then, you know, like saying things like,  
 16 "Can you make sure you support her." and that sort  
 17 of thing.  
 18 And I had just met him. I had just met  
 19 him. But for some reason, he decided that I was the  
 20 person to do that.  
 21 Q So you don't remember telling any  
 22 students that she was transgender?

11:20:58 1 A Uh-uh. Uh-uh.  
 2 MR. SHARMA: Is that a "no"?  
 3 THE WITNESS: Students – no. No. No.  
 4 No.  
 5 Students would ask questions about –  
 6 because they're curious. You know, students would  
 7 ask questions.  
 8 BY MR. CHARLES:  
 9 Q Do you remember what you told them when  
 10 they asked you questions –  
 11 A Like, you –  
 12 Q – about Ms. Eller?  
 13 A – know, that's – like, a kid might say,  
 14 like, that's a man that's in a dress.  
 15 And I be like, the person's transgender;  
 16 that it's okay and that sort of thing and – yeah.  
 17 They were curious. For a lot of students, that was  
 18 their first time interacting with a transgender  
 19 teacher.  
 20 Q And how did you respond to them?  
 21 A That – just to basically respect her.  
 22 That's a person that's in a dress. They making

11:21:29 1 their own decision and that sort of thing. Just --  
 2 you know, just to pull them back from their  
 3 surprise. Uh-huh.  
 4 Q Did Prince George's County provide you  
 5 with advice or training about how to relate to  
 6 transgender colleagues when you joined Friendly High  
 7 School or later when Ms. Eller joined?  
 8 A No. No, not specifically about adults.  
 9 Again, my training is always child-centered.  
 10 Q Did they give you any written materials  
 11 on how to be inclusive of transgender people in the  
 12 workplace?  
 13 A As far as the adults are concerned, no.  
 14 It would all -- again, it would always be  
 15 child-centered.  
 16 Q When you discovered Ms. Eller was  
 17 transgender, did you ask anyone for advice about how  
 18 to be inclusive of someone who is transgender in the  
 19 workplace?  
 20 A I don't think specifically that I did.  
 21 Q Had you ever worked with anyone who you  
 22 knew to be transgender prior to Ms. Eller?

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11:24:03 1 how she identifies. But she has never said to call  
 2 her by, like, "he" in that way.  
 3 Q So this person has never told you they're  
 4 transgender?  
 5 A No.  
 6 Q Okay.  
 7 A Uh-huh. No.  
 8 Q Okay.  
 9 MR. CHARLES: We're going to take a break  
 10 here --  
 11 THE WITNESS: Sure.  
 12 MR. CHARLES: -- for a couple minutes.  
 13 THE WITNESS: Okay.  
 14 (A lunch recess was taken.)  
 15 (Isom Deposition Exhibit 71 was marked  
 16 for identification and attached to the transcript.)  
 17 BY MR. CHARLES:  
 18 Q Ms. Isom, I'm going to show you a  
 19 document now --  
 20 A Sure.  
 21 Q -- which has been labeled Exhibit 71.  
 22 MR. CHARLES: I have copies for

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11:22:39 1 A Yeah. Ms. Tyrone would be one.  
 2 Let's see. Mostly -- mostly just gay but  
 3 not transgender.  
 4 Q Let me narrow my question.  
 5 A Back to that period of time in Friendly,  
 6 or now, this is in general?  
 7 Q Sorry. Let me ask --  
 8 A Okay.  
 9 Q Do you remember having worked with anyone  
 10 you knew to be transgender during your career as an  
 11 educator?  
 12 A I'm going through almost a 20-year -- no.  
 13 Q Okay.  
 14 A No.  
 15 Q And have you worked with anyone whom you  
 16 knew to be transgender since Ms. Eller?  
 17 A I'm not sure how one of the teachers at  
 18 Sumrattsville identifies. She -- she's a female,  
 19 but she -- no, she doesn't call herself by a male  
 20 pronoun. So that's hard to say.  
 21 There's a female teacher who dresses very  
 22 male and is gay. I do know that. But I don't know

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12:02:12 1 defendants' counsel.  
 2 THE WITNESS: Yeah. That's me.  
 3 BY MR. CHARLES:  
 4 Q All right.  
 5 A Uh-huh.  
 6 Q So if you could go ahead and just take a  
 7 minute or two and look this document over. There  
 8 are two pages to it.  
 9 A Okay.  
 10 I did a pretty good job telling you what  
 11 my job was. I'm glad I know.  
 12 Q Okay. Have you had sufficient time to  
 13 read the document?  
 14 A Yes. I'm familiar with it.  
 15 Q Have you ever seen this document --  
 16 A Yes.  
 17 Q -- before?  
 18 A Uh-huh.  
 19 Q Do you recognize this document?  
 20 A I do.  
 21 Q Do you recognize the information  
 22 contained in this document?

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12:04:05 1 A Absolutely.  
 2 Q What is this document?  
 3 A This basically tells you -- like, when I  
 4 described my job, this is -- this is it right here  
 5 that I'm referring to. These -- these are our  
 6 responsibilities as a pupil personnel worker.  
 7 Q Does this document accurately reflect  
 8 your job duties as you understood them at Friendly  
 9 High School between the years 2011 and 2016?  
 10 A I would say so, yes.  
 11 Q Okay. You can put that aside for now. I  
 12 may refer back to it --  
 13 A Okay.  
 14 Q -- in a few minutes.  
 15 A Uh-huh.  
 16 Q Thank you.  
 17 A Uh-huh.  
 18 Q What is a PS-74, Ms. Isom?  
 19 A That's when a teacher writes up a student  
 20 for their conduct and submits it to their  
 21 administrator.  
 22 Q Okay.

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12:04:58 1 A Yeah.  
 2 Q When does a teacher fill out a PS-74?  
 3 A I think they ask them -- because, like,  
 4 if a student really upsets a teacher -- they used to  
 5 say that the student has to come out, and there has  
 6 to be a PS-74, which is kind of impossible if you're  
 7 teaching your class. So they really want that  
 8 document as soon as possible after an incident  
 9 happens.  
 10 Q What kind of incident would rise to the  
 11 level of a PS-74?  
 12 A So they have -- if they're still using a  
 13 signed PS-74, there used to be bullet points on the  
 14 side, and you would select what they've done:  
 15 Disrespect, cursing, late for class, cutting. Just  
 16 any conduct that is against the code of student  
 17 conduct. Uh-huh.  
 18 Q Do you receive this form after a teacher  
 19 submits it?  
 20 A No. Again -- so those -- the things on a  
 21 PS-74 usually call for a short-term suspension. So  
 22 it's usually that sort of an incident; so -- I don't

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12:06:07 1 deal with short-term suspensions unless -- so at the  
 2 bottom of every suspension, my name is on the  
 3 document saying that, if you want to appeal this  
 4 suspension, contact Ms. Isom -- so in that way.  
 5 But that's -- that's for suspension, not  
 6 for PS-74. I don't get those. I would be  
 7 inundated. I really would.  
 8 Q Would there -- so would there ever be a  
 9 situation where you would see a PS-74?  
 10 A Used to before things were more  
 11 electronic. When a kid got suspended, part -- I  
 12 mean expelled, part of the packet is all of their  
 13 discipline. So in that packet might be a copy of  
 14 every time they were suspended. And some guidance  
 15 secretaries will also include the PS-74s that make  
 16 it into the cum folder.  
 17 Q And would you get a copy of the cum  
 18 folder in that instance?  
 19 A Not the whole cum. There are certain  
 20 things that you request. The -- my service is bad,  
 21 but there are certain things that you request for an  
 22 expulsion. It might be -- of course, it's going to

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12:07:12 1 be a security report and maybe pictures if the  
 2 incident involves, you know, something that you can  
 3 see.  
 4 What else is in the packet?  
 5 It used to be a copy of the suspensions  
 6 for sure. But sometimes the PS-74s -- they wouldn't  
 7 always include those with the jacket. It would  
 8 include that memorandum that the student signed  
 9 saying that they agree to the terms of -- not to do  
 10 the things that are expellable, basically. So they  
 11 sign that every year.  
 12 What else is in there?  
 13 Their report cards, schedule, attendance,  
 14 that sort of thing. But not always the PS-74s.  
 15 Q So do you know where the PS-74s would be  
 16 stored?  
 17 A I know they give them to the assistant  
 18 principal, and I -- and I think that the principal  
 19 signs it. There used to be several copies to it.  
 20 So one copy went back to the teacher. One had to go  
 21 in their cum folder. It had to be like that at that  
 22 time. And then I don't know where else.

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12:08:20 1 But it used to be a pullable -- you know,  
 2 with the -- several different -- pink copy, a  
 3 yellow, goldenrod, you know. But it's not like that  
 4 anymore. It's just one sheet of paper; so I  
 5 don't -- I'm not sure if they do a good job of  
 6 making sure they get the cum folder anymore.  
 7 Uh-huh.  
 8 Q So thinking just about that period of  
 9 time from --  
 10 A Sure.  
 11 Q -- 2011 to 2016 --  
 12 A Uh-huh.  
 13 Q -- did you ever see a PS-74 that  
 14 Ms. Eller wrote for a student?  
 15 A I don't know if I saw one specifically  
 16 that she wrote. I don't -- I can't say that -- I  
 17 don't know.  
 18 Q That's okay.  
 19 A Because, again, my -- my concern isn't  
 20 the PS-74s. My concerns as far as my job is  
 21 concerned are the expulsions and the extended  
 22 suspensions. It's the bigger offenses to the code

12:09:26 1 of student conduct that usually come to me unless a  
 2 student is suspended a million times. Then I get  
 3 involved with the student because he needs  
 4 additional services.  
 5 Q Okay. So a PS-74 goes in a student's  
 6 file?  
 7 A Then it did. I'm not sure that it still  
 8 does. I'm not sure of that process.  
 9 Q So from -- to the best of your knowledge,  
 10 from 2011 to 2016, a PS-74 would have gone in a  
 11 student's file?  
 12 A Usually. Usually. Yeah, I would think  
 13 so.  
 14 Q And during that time, would an assistant  
 15 principal have been notified about a PS-74?  
 16 A Yeah. I know that they have to be  
 17 submitted to the assistant principal, because that's  
 18 the person that's going to take action.  
 19 Q Okay. Thank you.  
 20 Did you use an -- did you use an email  
 21 account while you were working at Friendly High  
 22 School?

12:10:23 1 A Yes.  
 2 Q And what was that email account?  
 3 A It's my name. Jocelyn.Isom@pgcps.org.  
 4 Q Did you ever forward documents from that  
 5 email account to a personal email account?  
 6 A No.  
 7 Q Did you ever use a personal email account  
 8 for any work-related business?  
 9 A No. We have an FAC, which is an  
 10 organization -- it's an organization within the  
 11 pupil personnel workers; so they forward you stuff  
 12 like changes or seminars or things like that that  
 13 they're doing. So you use your -- I use a Gmail  
 14 account that also has my name, but the tag on it is  
 15 just at Gmail.com; so --  
 16 But that's not -- that has nothing to do  
 17 with work at a school. That's just like the --  
 18 let's say there's a unit organization within the  
 19 pupil personnel worker; so that's what you get.  
 20 Like invitations to the annual conferences and stuff  
 21 like that. They use that account for that.  
 22 Q Would you get notices at that Gmail

12:11:28 1 account of training opportunities?  
 2 A We have, like, a big conference in  
 3 Ocean City. I would get that. And then we have --  
 4 there's a local one that happens in Rockville.  
 5 That's it. That's just for FAC, which is separate.  
 6 It's weird, but it's separate from PG County  
 7 Schools. It's within PG County Schools because it's  
 8 the pupil personnel workers, but it's like their  
 9 union organization. And they send it -- the emails  
 10 have to go to your personal account.  
 11 Q Okay. So I was going to ask: What is  
 12 FAC? What does that stand for?  
 13 A Oh, man. I should know that, shouldn't I?  
 14 I don't know. It's more like your union  
 15 within the pupil personnel workers. So it's  
 16 something something council where we complain. I'm  
 17 serious. Where we complain about, like -- for  
 18 instance, just recently -- and I didn't get to go --  
 19 they were talking about our caseload being too big,  
 20 and so they had a meeting to -- because they're  
 21 going to go to the union about that. So it's that  
 22 sort of issues. It's employee complaints.

12:12:45 1 Q I see.  
 2 A Sometimes it's a little exhaustive.  
 3 Q The -- what would the conference in Ocean  
 4 City be about?  
 5 A Changes in laws, for instance.  
 6 Attendance is a big issue. So a lot of times it's  
 7 about attendance.  
 8 You can choose with -- there might be  
 9 three going on at the same time; so you can choose  
 10 what you want to go to. But some things are  
 11 mandatory, such as attendance and the change in the  
 12 code of student conduct this year. We would discuss  
 13 things like that.  
 14 And then it would be case studies. For  
 15 instance, somebody might bring up cases that they  
 16 want to discuss with the entire organization,  
 17 whoever showed up. So it would be things like that.  
 18 Q That would -- that was an annual  
 19 conference?  
 20 A Uh-huh. I just went for the first time  
 21 this year, though, because it's not mandatory to go.  
 22 Q Okay. So you did not -- or I should say

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12:14:46 1 an email, or they would type in a Word document  
 2 that -- but they would attach it to an email and  
 3 send it me, because it has to be an administrative  
 4 statement.  
 5 Mostly the stuff I print out is from  
 6 SchoolMAX, though. And that's not email.  
 7 Q What is SchoolMAX?  
 8 A SchoolMAX is the way that they keep track  
 9 of everything. It's -- the grading system is in  
 10 there for teachers. The attendance system is in  
 11 there. The discipline system is in there. That's  
 12 what it is. It's just the data.  
 13 Q Were PS-74s included in --  
 14 A No.  
 15 Q -- SchoolMAX?  
 16 A Uh-uh.  
 17 Q Okay.  
 18 A No. No.  
 19 PS-74 is a whole different document. I'm  
 20 not sure what format it's in because I don't write  
 21 them. I'm not sure if it's an Adobe or what it is.  
 22 Q Did you -- when would you delete emails?

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12:14:02 1 did you attend --  
 2 A Not during --  
 3 Q -- during 2011 --  
 4 A -- Friendly.  
 5 Q -- to 2016.  
 6 A No. I never went before until last year.  
 7 Q Okay. Going back to the emails during  
 8 your time at Friendly --  
 9 A Uh-huh.  
 10 Q -- how did you store emails on your work  
 11 account?  
 12 A I would either delete them, or when I  
 13 finished with them, they're just sitting still in my  
 14 inbox.  
 15 Q Okay.  
 16 A Just read -- they had been read.  
 17 Q Did you ever print out paper copies of  
 18 any emails between 2011 and 2016 that you remember?  
 19 A Sure. I would have to -- in the -- with  
 20 an expulsion, there is an administrative statement.  
 21 And a lot -- I would prefer that they type it out in  
 22 a Word document, but sometimes they would make it as

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12:15:46 1 A I'm not good with deleting emails. I  
 2 wish I was.  
 3 It depends. If it has nothing to do with  
 4 me, I try to get rid of it, like, right away. I  
 5 don't even read those.  
 6 I would say most of them are probably  
 7 still there. Yeah, it's Gmail-driven; so I think  
 8 it's bottomless, seriously, because we had another  
 9 system where they would say it was -- you had too  
 10 many emails. You need to clear out your -- what was  
 11 the one? Outlook. Remember Outlook? It would get  
 12 full. But now I haven't had a problem in years with  
 13 Gmail, unfortunately, because I really should have  
 14 deleted some of them emails.  
 15 Q So was there any regular process as to  
 16 how you would delete emails?  
 17 A What do you mean?  
 18 Q Was there a checklist you might go  
 19 through about whether or not to delete an email?  
 20 A No. If you mean, like, how would I  
 21 decide how I'm going to delete an email. Honestly,  
 22 I'm very lazy about deleting emails; so most of them

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12:16:52 1 are still there.  
 2 Q Okay.  
 3 A The only ones I definitely delete are the  
 4 ones that have absolutely nothing to do with me.  
 5 Like, the soccer team is going here or testing is  
 6 this particular day -- that stuff has nothing to do  
 7 with me at all; so I delete those.  
 8 Q Okay. Were you ever told to stop  
 9 deleting emails about a certain time period --  
 10 A No.  
 11 Q -- at Friendly?  
 12 A Uh-uh.  
 13 Q Okay. When you would print out emails,  
 14 what did -- scratch that.  
 15 When you would print out emails, what did  
 16 you do with the printed version of those emails?  
 17 A They would go in my expulsion packet  
 18 usually or my suspension packet because it would  
 19 have something to do with that. Or there may be  
 20 attendance emails from a teacher.  
 21 And if I'm -- if I'm referring somebody  
 22 to precourt -- that's what I call IAC -- then those

12:17:54 1 emails I would use, because usually they're saying I  
 2 contacted the parent on this particular day. And  
 3 that's what they want to know there is did anybody  
 4 reach out to the parents or -- you know, what steps  
 5 were taken to try and fix the attendance before I  
 6 referred it.  
 7 Q I see.  
 8 A Those definitely get printed -- anything  
 9 from a teacher about a student that is on my  
 10 caseload.  
 11 Q Okay. How long did you retain the  
 12 suspension and expulsion packets?  
 13 A We're supposed to keep them for  
 14 three years.  
 15 Q And where would they be kept, generally?  
 16 A I keep them in my office.  
 17 Q Okay.  
 18 A We keep -- the PPWs keep -- they're not  
 19 shared. Those are not shared with -- the only  
 20 person that will see it who's even interested in  
 21 seeing the packet is the assistant principal that's  
 22 going to the board for the conference.

12:18:57 1 Q And when you say your office, do you mean  
 2 your office in the school or --  
 3 A Uh-huh.  
 4 Q -- do you mean your -- okay.  
 5 A Uh-huh, Uh-huh.  
 6 Q Okay.  
 7 A Usually you have an office at the high  
 8 school. Uh-huh.  
 9 Q And after you leave a position as a PPW,  
 10 do you know what happens to those files?  
 11 A When I leave one school and go to the  
 12 next one?  
 13 Q Uh-huh.  
 14 A They stay there because the next PPW that  
 15 comes into that place, they need to have access to  
 16 that information just in case. I mean, you never  
 17 need it, but just in case.  
 18 Q Okay. And --  
 19 A Actually, a couple of times I did need  
 20 them. If a kid got in a lot of trouble, the courts  
 21 used to subpoena some documents. And so, therefore,  
 22 some of that stuff might be in my file.

12:19:42 1 Q And do you know who the new PPW is at  
 2 Friendly High?  
 3 A Yes, Sharon Parker.  
 4 Q And based on what you said earlier, it  
 5 sounds like you may interact with Ms. Parker because  
 6 PPWs --  
 7 A Uh-huh.  
 8 Q -- interact with one another.  
 9 A Uh-huh. Especially at the beginning.  
 10 Now that -- so last year -- since that was the  
 11 fourth year that I was away, that was the last group  
 12 of kids that I had that -- and they graduated out.  
 13 But at the beginning, she was still  
 14 communicating with me. Like, "Do you know the  
 15 Parker family?" Or "Do you know the" -- you know  
 16 what I'm saying? Just to get a little bit more  
 17 information about a situation that's maybe  
 18 continuing.  
 19 Q So you communicated with Ms. Parker. So  
 20 how often did you communicate with Ms. Parker in the  
 21 year -- in the first year you had been gone from  
 22 Friendly?

12:20:43 1 A Oh, shoot. Quite a bit that year because  
 2 she was being trained. So she would be like, "Can I  
 3 go with you on a couple of home visits?" stuff like  
 4 that.  
 5 So it would be that kind of movement  
 6 between her and I. And she might ask me about a  
 7 family or what resources I had for certain things.  
 8 Because, basically, with that job -- like, with  
 9 teachers or with administrators or guidance  
 10 counselors, there's somebody in the next office or  
 11 the next classroom that does your same job.  
 12 When you're a PPW, you're the only person  
 13 that does it in the building; so you have to contact  
 14 one another. We kind of train one another in  
 15 that -- in that way. And we all have different  
 16 resources.  
 17 Q Did Ms. Parker ever come to you with  
 18 questions about transgender students at Friendly?  
 19 A Uh-uh.  
 20 Q Did Ms. Parker ever come to you with  
 21 questions about transgender colleagues at Friendly?  
 22 A Uh-uh.

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12:22:33 1 ninth grade the first time. We usually get a list  
 2 of -- they used to call it the red flag list, and it  
 3 would come from the middle school, the eighth grade  
 4 students that were entering high school for us to  
 5 focus on.  
 6 What was the question again? I'm sorry.  
 7 Q A summary of your duties with regard  
 8 specifically to students.  
 9 A So you would -- you would develop your  
 10 own caseload. You weren't really given a caseload.  
 11 That was a caseload, the -- of course, those  
 12 students. But then you will pull up students who  
 13 were in danger in other areas like failing two or  
 14 more classes, not coming to school.  
 15 So you would create your own caseload  
 16 list of students that you needed to focus on. And  
 17 so in that way, I did that. I took people to court  
 18 if their parent continued to not send them to school  
 19 or the kid continued to cut school. I would take  
 20 them -- we referred them to precourt, because that's  
 21 where you start.  
 22 I dealt with discipline that was extreme,

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12:21:36 1 Q Okay. Thank you for that.  
 2 A I mean no.  
 3 Q Yes. Thank you.  
 4 A No.  
 5 Oh, my goodness. No.  
 6 Q That's okay. You're doing great.  
 7 Okay. As a pupil personnel worker at  
 8 Friendly, can you give me a summary of what your  
 9 duties were with regard to students?  
 10 A Attendance was a huge issue. At that  
 11 time, students who were 16 who were not making any  
 12 progress, they could be withdrawn from school. So a  
 13 lot of efforts were made to get students onboard and  
 14 get them out of the ninth grade so that -- because  
 15 the repeating ninth grade issue -- so there's a  
 16 statistic that says if you don't pass ninth grade  
 17 the first time, there's a 700 percent chance that  
 18 you will not graduate from high school. So that  
 19 resonates with the PPWs because it's repeated to us  
 20 so often.  
 21 Q Okay.  
 22 A And so we try to get students out of the

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12:23:25 1 the extended suspensions and the expulsions. So  
 2 that was basically what I did.  
 3 Q Okay. Did you ever work with --  
 4 A Residency investigations.  
 5 Q Thank you.  
 6 A That's an important one. I'm sorry. I  
 7 apologize.  
 8 Q Anything else?  
 9 A That's -- that's -- those are the main  
 10 things that I'm thinking of. Uh-huh.  
 11 Q Did you ever work with students who had  
 12 issues respecting teachers' authorities in the  
 13 classroom?  
 14 A Oh, my goodness. That's bas- -- yeah.  
 15 If it's really bad, yes. Yes.  
 16 Q How did you counsel students to respect  
 17 teachers?  
 18 A Usually the students that I dealt with --  
 19 because at that time, you could suspend kids for  
 20 disrespecting, that sort of thing. So if that kind  
 21 of behavior led to, like, a threat or something like  
 22 that, I ended up dealing with those students to make

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12:24:15 1 them understand that you are actually violating the  
 2 code of student conduct to a pretty egregious level.  
 3 So that's really what would happen.  
 4 And those students that did it a lot --  
 5 it wouldn't be all of them. It would be the  
 6 students that are really difficult, because most of  
 7 my kids were really quite difficult a lot of times.  
 8 They didn't make it across the stage.  
 9 So if it was that bad, those students, I  
 10 would say things like, "I rather you walk out the  
 11 classroom and come in here and take it out on me."  
 12 Because I'm real strong; so I can take it. I've had  
 13 students busting my room totally cussing about how  
 14 they're getting ready to hurt somebody; so I--  
 15 yeah. I deal with kids that are like with some  
 16 serious emotional issues, baggage that's coming from  
 17 home and spilling over to the school. Those are the  
 18 kids that I see.  
 19 Q Okay.  
 20 A High-flyers.  
 21 Q Could a student be suspended for  
 22 disrespect --

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12:26:07 1 weren't sent to me. It might be an issue -- I used  
 2 to get involved in stuff that didn't involve me.  
 3 But, like, my job -- because I might just, you know,  
 4 hear it and say, you know, "What happened there?"  
 5 But there were a couple of instances --  
 6 well, one in particular where I got involved in an  
 7 incident that happened with Ms. Eller.  
 8 Q Was that incident involving a student who  
 9 knew she was transgender?  
 10 A Uh-huh.  
 11 Q Did that student have an issue respecting  
 12 her because of that?  
 13 A Yeah. That's what -- he had a problem  
 14 respecting her because of that. But he disrespected  
 15 other people for whatever reason he didn't like  
 16 them. He was a really evil kid. He was. He was  
 17 involved in a very dangerous gang.  
 18 Q I see.  
 19 What did you say to that student about --  
 20 I heard you say "his."  
 21 A Uh-huh.  
 22 Q Is that the right -- okay.

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12:25:10 1 A Then.  
 2 Q -- during 2011 --  
 3 A Yes.  
 4 Q -- to 2016?  
 5 A Yeah. Then. Yes, they could.  
 6 Now, no, which is crazy. Either he  
 7 leaving or I'm leaving. Yeah, seriously, like --  
 8 some of it's bad. So it has to be super threatening  
 9 in order for it to lead to a suspension now. But  
 10 then, absolutely.  
 11 Q Would students who harassed or  
 12 discriminated against others be students you would  
 13 deal with?  
 14 A Uh-huh. If the level is really bad. If  
 15 the student's, like, going back and forth with each  
 16 other on social media, no, unless I did a mediation  
 17 with those students in order to make them behave at  
 18 school.  
 19 Q Did you work with students during 2011 to  
 20 2016 at Friendly who did not respect Ms. Eller  
 21 because they knew or suspected she was transgender?  
 22 A Not specifically. They weren't -- they

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12:27:00 1 What did you say to that student about  
 2 his issue with Ms. Eller regarding --  
 3 A "You going out of here."  
 4 Do you want to hear what happened in the  
 5 incident?  
 6 Q Let's go a question at a time --  
 7 A Okay.  
 8 Q -- if that's okay.  
 9 So do you remember what he said to  
 10 Ms. Eller?  
 11 A It wasn't what he said. It was what he  
 12 did.  
 13 Q Okay. And what did he do?  
 14 A He stood at Ms. Eller's door with an iPad  
 15 and was recording her from outside the door.  
 16 Q And what was the purpose of that action?  
 17 MR. SHARMA: Objection.  
 18 You can answer if you know.  
 19 THE WITNESS: Uh-huh. I can't say. I  
 20 really don't know. He was stupid.  
 21 BY MR. CHARLES:  
 22 Q Did the student tell you why he did that?

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12:27:57 1 A No, not this student. He's not going to  
 2 be there. He's going to tell you off for catching  
 3 him. He's -- yeah, he was that kind of kid.  
 4 Q So how did Ms. Eller react when that  
 5 student started doing that?  
 6 A She let the -- so I wasn't involved on  
 7 that part of it. She let them know what had  
 8 happened, that a boy had stood at her door and had  
 9 recorded her.  
 10 And I want to say she said something to  
 11 the student and started walking towards the student,  
 12 and the student took off running.  
 13 Q Who is "them"? You said "she let them  
 14 know."  
 15 A No. Him.  
 16 Q Oh, him.  
 17 A Yeah. Uh-huh. It was just one person at  
 18 the door.  
 19 Q Okay.  
 20 A This boy didn't have friends.  
 21 Q So when did you become involved in this  
 22 situation?

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12:29:57 1 Q Did you advise this student at all about  
 2 his behavior towards Ms. Eller?  
 3 A Yeah. I was always pretty mean to this  
 4 kid, to be honest with you. I'm not even going to  
 5 lie. He -- because of the things -- his antics  
 6 caused us a lot of problems around the building.  
 7 So in the case of that, it took us  
 8 two weeks to figure out who the student was.  
 9 Q Did he say -- did Ms. Eller tell you that  
 10 he said anything out loud while he was recording  
 11 her?  
 12 A No, I don't think he did.  
 13 He was hooded --  
 14 Q Okay.  
 15 A -- everything.  
 16 Q Okay.  
 17 A We couldn't even see him at first on  
 18 camera.  
 19 Q Thank you, Ms. Isom.  
 20 A Uh-huh.  
 21 Q Do you recall any other students you  
 22 worked with who did not respect Ms. Eller because

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12:28:55 1 A I heard about it. And so what -- I heard  
 2 about it; so I wanted to get to -- we didn't -- we  
 3 didn't know who the student was, and she didn't know  
 4 the student. So we had to figure out who the  
 5 student was.  
 6 I got involved in it because I was  
 7 offended by it. So that's why I jumped my nose in  
 8 it.  
 9 Q What did the student say to you about  
 10 Ms. Eller when you confronted him about the issue?  
 11 A Nothing about Ms. Eller. The way he  
 12 responded was -- he kind of like cussed us out for  
 13 catching him. So you just go home. He's never  
 14 going to talk to you about what he did. He's not  
 15 going to take responsibility. And he just really --  
 16 honestly, he had no conscious. He didn't care.  
 17 This student could possibly have been  
 18 responsible for one of our kids getting shot at a  
 19 birthday party; so -- he was involved with a group  
 20 called Baby Haiti, which was a serious street gang.  
 21 Q I see. I'm very sorry to hear that.  
 22 A Uh-huh.

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12:30:41 1 they knew or suspected she was transgender?  
 2 A I don't know. I would have to be  
 3 reminded; so -- I don't -- I don't know.  
 4 Q Okay. Do you remember ever mentioning to  
 5 a student that Ms. Eller was transgender in the  
 6 course of working with a student?  
 7 A To be honest with you, a student wouldn't  
 8 have to be told that. They could clearly see that  
 9 Ms. Eller was transgender. And she was very open  
 10 about it, and she spoke of it. She wasn't shy about  
 11 being transgender at all.  
 12 Q Okay.  
 13 A Like, she had, like, a whole board  
 14 dedicated to organizations with phone numbers to  
 15 help students who were struggling with gay issues  
 16 and depression. She had a whole -- a whole  
 17 classroom board was dedicated to -- I came into her  
 18 classroom to get a number off the board before.  
 19 Uh-huh.  
 20 Q I see.  
 21 What are the rights of transgender  
 22 students in Prince George's County Public Schools as

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12:31:42 1 you understand them?  
 2 A To not be discriminated against for any  
 3 reason. You're treated as any other student.  
 4 Q Have you, to your knowledge, worked with  
 5 a transgender student at -- in Prince George's  
 6 County Public Schools?  
 7 A During this period?  
 8 Q Yes, ma'am.  
 9 A Transgendered. Yes. Yes.  
 10 Q And who is that student?  
 11 A His name was [REDACTED]  
 12 This was a particularly bad situation.  
 13 Q And what year was that that you worked  
 14 with the student?  
 15 A That was -- was that my last year there  
 16 or the year before that?  
 17 It was somewhere within those last couple  
 18 years that I was there.  
 19 Q And in what capacity did you work with  
 20 this student?  
 21 A Well, this student -- we -- there was a  
 22 big fight that happened, and we were sending the

12:32:37 1 kids -- they were late for class because they were  
 2 watching it. We were sending the kids on their way,  
 3 And he walked up to me and said --  
 4 because he was a male the first, like, maybe week of  
 5 school he was -- he dressed as a male the first week  
 6 of school. And he came up to me and asked me what  
 7 happened.  
 8 And I turned around and was like, "If you  
 9 don't go to class" -- because it was a real hot,  
 10 tense situation.  
 11 And he just cussed me completely out; so  
 12 he got suspended.  
 13 Then when he came back -- I spoke to his  
 14 mother. He came -- she said he's going to  
 15 apologize. I don't like when people make kids  
 16 apologize. I think that you should just do it.  
 17 So I was in the cafeteria one day, and I  
 18 was on the stage talking to Ms. Pope-Brown,  
 19 actually, about one of her students. And when I  
 20 turned around, this boy was sitting at the lunchroom  
 21 table by himself, which was unfair, because at this  
 22 point now, we're a month into the school system

12:33:31 1 pro- -- the school year.  
 2 And when I was coming off the stage, he  
 3 was looking at me like this and just watching me.  
 4 And I said, "Is there something wrong?"  
 5 Because you could clearly see in his face  
 6 that something was wrong.  
 7 And so he said, "Can I talk to you?"  
 8 This same boy who just cussed me out a  
 9 couple weeks before.  
 10 "Yeah."  
 11 So we go back to my office.  
 12 Okay. I'm going too fast.  
 13 The first football game is when this  
 14 student started dressing as a female. Lipstick,  
 15 crop top, tight pants -- the whole thing.  
 16 Well, what he described to me that  
 17 happened was -- a lot of students who will wear  
 18 makeup and do those things before they go home, they  
 19 might remove it.  
 20 So his father found the lipstick and beat  
 21 him. So that's what he wanted to see me about. And  
 22 he actually had bruises. And Mr. Adams got

12:34:23 1 involved. We had to take pictures of it and call  
 2 Child Protective Services.  
 3 What bothers me is I never saw that kid  
 4 again. They wouldn't answer the door for -- nope.  
 5 They wouldn't open the -- I was very nervous about  
 6 [REDACTED] And every once in a while, I'd look him up.  
 7 And then finally, maybe about two years  
 8 later, his parents put him in evening school. But I  
 9 hadn't heard anything about him. I mean -- and I  
 10 listen to ridiculous podcasts. So I was just like,  
 11 What if they killed him? Because, for real, if  
 12 somebody disappears and the father's mad he's gay  
 13 and -- it was a real bad situation.  
 14 The mother and sister were blocking the  
 15 door and letting the father really -- this boy had  
 16 purple bruises all over. But the father was smart  
 17 enough not to put it anywhere visible. But when he  
 18 showed it, it was there.  
 19 So that's some of the situations that  
 20 those kids go through coming out. It depends. It  
 21 could be really rough.  
 22 Q I'm very sorry to hear that.

12:35:11 1 A I felt like it was my fault, you know. I  
 2 felt like it was my fault.  
 3 Q Well, it sounds to me like you were just  
 4 doing your job.  
 5 A I was. I was. And you -- and I learned  
 6 from a principal, you -- and I still say this. You  
 7 can't fault somebody for doing their job. But  
 8 sometimes those situations like that make you say.  
 9 "Wow. Was that a mistake?"  
 10 But you got to call Child Protective  
 11 Services because he needs protection. But then for  
 12 them to not open the door for Child Protective  
 13 Services and their family to disappear like that was  
 14 scary until I saw him at evening school. It was,  
 15 like -- that's what happened to [REDACTED]  
 16 Q Did [REDACTED] tell you how students and  
 17 teachers were treating them?  
 18 A No, because he was flamboyant, and he's  
 19 the type that wouldn't take that. You know what I  
 20 mean? Like, he's a turn-up kid. So if somebody --  
 21 like, he didn't like what I said to him, and he gave  
 22 it to me, you know.

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12:37:14 1 Q Yeah.  
 2 A They're not willing to take  
 3 responsibility for what they did.  
 4 So she called me and kind of, like, told  
 5 me off, you know. But I never expected her not to  
 6 ever send him back to school.  
 7 She signed up for homeschooling and  
 8 scared me to death, seriously, because now I know  
 9 you're not -- because the kids in the  
 10 neighborhood -- they lived on -- it was the  
 11 neighborhood I grew up in. And if a kid said -- you  
 12 know, "You know [REDACTED]  
 13 Like, "We never see him anymore."  
 14 So it just was increasing the fear.  
 15 Q Do you remember talking to his parents  
 16 about him being transgender?  
 17 A Uh-uh.  
 18 Q Okay.  
 19 A Uh-uh. That wasn't the conversation. It  
 20 was like, "Who called Child Protective Services on  
 21 us?"  
 22 That's what they wanted to know.

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12:36:13 1 And usually I'm in very high heel shoes.  
 2 I look intimidating to me. But he wasn't  
 3 intimidated at all. And he let me know.  
 4 But you know what? The kids that do that  
 5 always end up being the kids that are closest to me.  
 6 That's how I get my caseload. Like, are you out of  
 7 your mind? So--  
 8 Q So did you try to speak to the [REDACTED]  
 9 family?  
 10 A The mother called me to tell me off.  
 11 Like, "We didn't do anything to him."  
 12 But, I mean, we had pictures. We knew  
 13 that she had.  
 14 So she called -- and what parents do is  
 15 they fish to try to figure out who called Child  
 16 Protective Services, because it's done anonymously.  
 17 They're not supposed to know.  
 18 But I always -- if I called, I let the  
 19 parents know that I called because I don't need you  
 20 thinking maybe it was Ms. So-and-So and then going  
 21 after them. Because then parents -- a lot of times  
 22 they are very angry, of course, you know.

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12:37:54 1 Q Do you remember a student named  
 2 [REDACTED]  
 3 A Why does that name stick out to me?  
 4 For some reason, that name sounds  
 5 familiar. I'm not sure, though. [REDACTED]  
 6 Q He would have been a student in -- during  
 7 this time period that you were at Friendly.  
 8 A I keep picturing this kid that's white  
 9 is he white?  
 10 I don't -- I have to be reminded. And  
 11 you know what's bad with me? I'll tell you a little  
 12 bit about me. A lot of times I will forget a  
 13 student's name.  
 14 If someone says, "Do you know [REDACTED]  
 15 [REDACTED]  
 16 And I be like, "Who?"  
 17 And lot of times they say, "That's the  
 18 boy who," and then I say, "Oh, yeah. Yeah. Yeah.  
 19 Yeah. Yeah."  
 20 I'm more like that. I remember the  
 21 situation better than I do a name. I'm horrible  
 22 with that.

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12:38:48 1 Q Just a moment.  
 2 A Okay.  
 3 Gosh, [REDACTED] I wish I had a  
 4 yearbook in front of me.  
 5 Q Okay. So do you remember [REDACTED]  
 6 transitioning while he was at Friendly High School?  
 7 A That's what's coming up in my head, that  
 8 there was a kid -- that's what -- it's -- I'm  
 9 leaning towards that he was -- he was gay. But I  
 10 can't remember [REDACTED]  
 11 But I remember that -- I remember -- it's  
 12 like -- I'm having pops in my head of this kid. But  
 13 to me he's light skin with this -- with a hairdo  
 14 that's like a little bit longer in the front, if I'm  
 15 right. But that's -- it's fuzzy.  
 16 Q That's okay.  
 17 A It's super fuzzy.  
 18 Q Do you remember anything else about him?  
 19 A No. And I don't even remember that. I'm  
 20 just kind of guessing.  
 21 Q Sure. That's okay. No problem.  
 22 A I wish I had a yearbook in front of me.

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12:39:46 1 Q That's all right.  
 2 A I really do. Because I want to -- like,  
 3 who is [REDACTED]  
 4 Q That's all right.  
 5 Do you remember a student named  
 6 [REDACTED]  
 7 A No, I don't remember that name at all.  
 8 Q Okay.  
 9 A See, a lot of those issues like that,  
 10 the -- it would be the guidance counselor that  
 11 would -- yeah. Because you got to remember, I'm  
 12 more like -- one of our positions -- one of the --  
 13 our duties, they say you're the superintendent's  
 14 designee. So a lot of stuff is like -- that's  
 15 school-related. It's just -- it's not board-level  
 16 related. So it would probably be a guidance  
 17 counselor that dealt with that student.  
 18 Q Okay. Thank you.  
 19 A Sorry about that.  
 20 Q No. No need to be sorry.  
 21 A But the name is just killing me.  
 22 Q That's okay. Okay. Don't let it

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12:40:35 1 frustrate you too much. We can always come back to  
 2 it if you --  
 3 A Okay.  
 4 Q -- remember something.  
 5 As a PPW at Friendly, what were your  
 6 duties with regard to teachers?  
 7 A They might stop me in the hallway. You  
 8 really don't deal directly with the teachers.  
 9 Unlike a lot of PPWs, I really do end up  
 10 conversating with teachers more often. They'll come  
 11 to me, because a lot of teachers -- most of the time  
 12 they're like, "What is a PPW?" They've never even  
 13 heard of it.  
 14 But when I come to a school, I get to  
 15 know the staff in that way. Like, I don't -- you  
 16 know what I mean?  
 17 Q Uh-huh.  
 18 A This personality that you see here is the  
 19 personality I take to work. So it kind of -- you  
 20 know, I'm not saying -- I kind of draw people to me.  
 21 So in that way, people feel comfortable saying, "I  
 22 haven't seen [REDACTED] in three weeks." So they feel

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12:41:26 1 comfortable talking to me and stopping me in the  
 2 hallway and saying things like that.  
 3 Q But interacting with them is not a  
 4 required job duty --  
 5 A No. Not --  
 6 Q -- of a PPW?  
 7 A No.  
 8 Q Okay.  
 9 A It would -- that would probably be more  
 10 of the professional school counselor.  
 11 Q How frequently did you visit teachers in  
 12 their classrooms if there was an issue with a  
 13 student?  
 14 A Never. That didn't --  
 15 Q Okay.  
 16 A -- generally happen.  
 17 Q Okay.  
 18 A No. Let me take that back. That's not  
 19 true.  
 20 I would talk to a teacher about a student  
 21 if they were -- if there were certain things that  
 22 were going on that involved a teacher that

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12:42:10 1 another -- we're working on whatever with that  
 2 particular student.  
 3 It wouldn't happen a lot, but there were  
 4 some students that required me to talk to -- because  
 5 I would talk to -- like, students that are almost  
 6 about to fail a class, "What does he have to do to  
 7 pass this class?" you know, that sort of thing. And  
 8 "What's going on with him? Is he coming to your  
 9 class now?" that sort of thing.  
 10 Q I see.  
 11 A "Did you reach out to the parent?" you  
 12 know.  
 13 Yeah. So in that way I did talk to some  
 14 teachers about certain students.  
 15 Q Okay. And so your role -- how would you  
 16 describe your role, then, in that -- in that  
 17 situation?  
 18 A As a case manager for that --  
 19 Q Okay.  
 20 A -- particular student.  
 21 Q Okay. As a PPW, is part of your job to  
 22 interpret Prince George's County Public Schools'

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12:42:54 1 administrative policies, procedures, federal, state,  
 2 and local laws?  
 3 A Yes, in regards to students.  
 4 Q Okay.  
 5 A Uh-huh.  
 6 Q What kinds of Prince George's County  
 7 Public School administrative policies and procedures  
 8 were you responsible for interpreting?  
 9 A Attendance mostly and discipline.  
 10 Sometimes residency.  
 11 Q And what kinds of federal laws?  
 12 A I'm trying to think. Bullying and  
 13 harassment is pretty federal. If it -- if the  
 14 bullying and harassment led to a level where it  
 15 might -- if a student needs to be transferred out of  
 16 our school, whether it's the victim of something  
 17 like that or the perpetrator, then I do initiate  
 18 requesting that -- a transfer for that student to a  
 19 different school.  
 20 Or a student who has been targeted by a  
 21 group of kids or beat up by kids or something like  
 22 that and the parent feels uncomfortable, I

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12:44:04 1 facilitate that student being transferred to a  
 2 different school.  
 3 Q And does that fall under interpreting a  
 4 particular law? A local law? A state law?  
 5 A No. It just might be how we respond  
 6 to --  
 7 Q Okay.  
 8 Okay. What kinds of state and local laws  
 9 were you responsible for interpreting?  
 10 A So what happens is -- with those  
 11 administrative procedures, that code of student  
 12 conduct, I conduct that. Usually I'm the person  
 13 that does it for every quarter, talking to the  
 14 students about their discipline and what kind of  
 15 things would get them expelled in their attendance.  
 16 So I kind of did that -- I did that particular  
 17 training with the students.  
 18 Now we kind of do the training for the  
 19 attendance with the teachers as well.  
 20 Q Okay.  
 21 A So it's usually around the -- the code of  
 22 student conduct is my bible, to be honest with you.

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12:44:53 1 Q Okay.  
 2 A Yeah.  
 3 Q Did Prince George's County ever offer you  
 4 any training to aid you in the interpretation of the  
 5 code of student conduct?  
 6 A Uh-huh. We always go over the code of  
 7 student -- because it changes every year.  
 8 Q Okay.  
 9 A So we go over the code of student  
 10 conduct. That's usually our first training as a PPW  
 11 that year. Or if we're having -- training usually,  
 12 when you first come back to school, is usually a  
 13 day, two, or three.  
 14 Q Okay.  
 15 A So it depends on how many changes there  
 16 has been. So when there's a significant change --  
 17 for instance, this year with the code of student  
 18 conduct, we had quite a bit of training on the  
 19 change in the code of student conduct. So, yes, we  
 20 do that first, and attendance.  
 21 Q What were the changes in the code of  
 22 student conduct?

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12:45:41 1 A So in regards to this year --  
 2 Q I'm sorry. Were there changes to the  
 3 code of student conduct during the time you were at  
 4 Friendly?  
 5 A Nothing significant. It'd still allow  
 6 for a lot of suspendible offenses. And, again, we  
 7 were able to put kids out at the age of 16.  
 8 Q Okay. When you -- so talking about the  
 9 quarterly trainings that you did for students --  
 10 A Uh-huh.  
 11 Q -- about the code of conduct, did those  
 12 also cover infractions that were lower in severity?  
 13 Like --  
 14 A Uh-huh.  
 15 Q -- in-school suspension, like things  
 16 students could do that would result in ISS?  
 17 A Very little. It mostly talked about  
 18 expellable offenses. Usually it was the assistant  
 19 principal -- like, the code of student conduct  
 20 assemblies would be, like, the assistant principal  
 21 speaks with them -- the assistant principal for that  
 22 grade level. Then the guidance counselor speaks to

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12:49:06 1 A Okay.  
 2 Q Okay. Have you had sufficient time to  
 3 look through this document?  
 4 A Yeah. Because what happened is, while I  
 5 was flipping through it, I realized that we have  
 6 received quite a bit of training, because there's,  
 7 like, so many areas of this -- I kind of feel like I  
 8 know this whole thing anyway.  
 9 Q So do you recognize this document?  
 10 A I don't know if I recognize this  
 11 particular document.  
 12 Q Do you recognize the information  
 13 contained?  
 14 A Yes. That's what I was saying, that we  
 15 absolutely have received quite a bit of training  
 16 because everything in here I have actually  
 17 learned --  
 18 Q And when you say "we" --  
 19 A -- from my training.  
 20 Q -- who are you referring to?  
 21 A Pupil personnel workers.  
 22 Q Okay.

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12:46:53 1 them, and then I speak to them.  
 2 So the principal -- I mean, the assistant  
 3 principal will mostly talk about the conduct that  
 4 they expect to see. And usually those things would  
 5 kind of cover some of the smaller infractions. The  
 6 stuff I went over was, like, weapons, drugs,  
 7 robbery, those sort of things. I went for the big  
 8 stuff. And then I talked about attendance and  
 9 things like that.  
 10 Q Okay.  
 11 Okay. Okay. I'm going to show you  
 12 another document, Ms. Isom --  
 13 A Sure.  
 14 (Isom Deposition Exhibit 72 was marked  
 15 for identification and attached to the transcript.)  
 16 BY MR. CHARLES:  
 17 Q -- which has been labeled Exhibit 72.  
 18 A Thank you.  
 19 Q Yes. Thank you.  
 20 So as we did with the other document,  
 21 please take a few moments to look through this  
 22 document.

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12:52:10 1 A And I remember -- I was involved in the  
 2 discussion at Friendly about trying to figure out  
 3 how to designate a bathroom, because, you know, the  
 4 schools are already built; so the male and female  
 5 bathroom -- it's hard to fix that because it already  
 6 is what it was. And I remember being a part of that  
 7 conversation. Not all the way to the solution, but  
 8 we were kind of, like, brainstorming.  
 9 Q When did that discussion take place?  
 10 A It had to have been towards the --  
 11 Mr. Adams was still there; so it had to be -- well,  
 12 actually, he was still there the whole time I was  
 13 there until the very end.  
 14 I would say within that -- probably that  
 15 year before I left, maybe to the year I left,  
 16 somewhere towards the end of the conversation.  
 17 Because, see, the reason why I said that,  
 18 Ms. Pope-Brown did not come the first year I was  
 19 there. She came the second year. So the  
 20 conversation couldn't have been the first year. It  
 21 would have had to be somewhere towards the end of  
 22 it, to me.

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12:53:13 1 Q Would you say it was maybe sometime  
2 between 2015 and 2016?  
3 A It could have. I'm not sure.  
4 Q No problem.  
5 A Uh-huh.  
6 Q So what is this document?  
7 A This document is talking about the -- to  
8 practice -- not discriminated against transgender.  
9 It's kind of a teaching document at the same time.  
10 Q Okay.  
11 A Uh-huh.  
12 Q Do you know -- were you ever provided  
13 with this document before today as part of your job  
14 as a PPW during your time at Friendly from 2015 to  
15 2016?  
16 A I don't -- I'll be honest with you, I  
17 don't remember. I would have to look at my PPW --  
18 we have this manual, like -- it's a notebook,  
19 really, though, but it's a -- it's a guideline for  
20 PPWs. I'd have to look in there and see if this  
21 specific document is in there.  
22 I could have. I'll be honest with you, I

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12:54:16 1 just don't remember.  
2 Q That's okay.  
3 Did you ever use these guidelines to  
4 support students or interact with staff?  
5 A Yeah.  
6 Q These specific guidelines?  
7 A Some of them, yeah. Like, the bathroom  
8 issue, a student wanting to use the bathroom in the  
9 nurse's office, that -- that issue comes up. I  
10 remember -- I remember that coming up. I remember  
11 that -- I remember parts of -- not disclosing things  
12 to parents and not being -- you know, the  
13 conversation that we have with them.  
14 There was something else that  
15 particularly stood out with what I do.  
16 Q Okay. Thank you, Ms. Isom.  
17 A Uh-huh.  
18 Q I think you can put that aside for now.  
19 We might return to that in a few minutes.  
20 As a PPW, did you have the authority to  
21 request from Principal Adams or other assistant  
22 principals a training that was not already provided

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12:55:33 1 to faculty or staff?  
2 A He might ask me to do part of a training  
3 with the staff. Yeah.  
4 Q When you say "with the staff" --  
5 A So I usually do a training with the staff  
6 on attendance -- attendance reporting and those sort  
7 of things. That's -- basically, that's what I spoke  
8 with teachers about.  
9 Then one time they had a gripe section  
10 because of the code of student conduct. Because at  
11 that time, insubordination was taken out of the code  
12 of student conduct. You couldn't be -- you couldn't  
13 put on some -- on a suspension that a kid was  
14 insubordinate because "insubordinate" is a really  
15 big word.  
16 Q Okay.  
17 A And people were using it too much. So  
18 they took it out.  
19 So I remember having -- letting the  
20 teachers have a gripe section with me because the  
21 code of conduct -- they had to take it out on  
22 somebody, so I was the person they took it out on.

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12:56:25 1 That's really just the best way to say it, because  
2 that's the truth.  
3 Q I'm sorry about that.  
4 A I lived through it. Every two weeks they  
5 give me my money, so I'll just --  
6 Q That's the truth.  
7 A It's true.  
8 Q Did Mr. Adams or any other assistant  
9 principal ask you to do a training about transgender  
10 issues?  
11 A No. But they had one.  
12 Q Do you remember when that training was?  
13 A I want to say it was the last year I was  
14 there. I want to say it was the last year I was  
15 there.  
16 Q But -- oh, sorry.  
17 A No.  
18 Q Go ahead.  
19 A I'm done.  
20 Q Okay.  
21 A I just said that twice.  
22 Q But that was not a training that the

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12:57:04 1 principals asked you to put on?  
 2 A No.  
 3 Q Okay.  
 4 A No.  
 5 Q As a PPW, did you provide professional  
 6 development to school staff on a variety of topics?  
 7 A Not a -- not a big variety. Just, again,  
 8 attendance. And then, like, the discipline gripe.  
 9 But usually it was attendance and that sort of  
 10 thing.  
 11 I didn't come to the trainings very  
 12 often, and I only went if I had to do that, address.  
 13 Q Got it.  
 14 And how often during the school year  
 15 would you provide those attendance and  
 16 discipline-related trainings for staff?  
 17 A For staff, attendance probably -- I  
 18 probably came in there and spoke with them about  
 19 attendance maybe -- because I ran a contest at  
 20 Friendly one time. I would say at least three times  
 21 a year I would come in there and have at least a  
 22 discussion with them about -- I might get a

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12:58:47 1 past a certain amount of time and that sort of  
 2 thing. You can't -- I can't tell exactly what it  
 3 is, but I know that there are rules within that; so  
 4 you have to stay right within that. And, yeah,  
 5 staff are supposed to come --  
 6 Q Okay.  
 7 A -- if they were present that day.  
 8 Q And are the trainings that you put on  
 9 about attendance and discipline, were you  
 10 responsible for creating that content --  
 11 A Uh-huh.  
 12 Q -- of those trainings?  
 13 A Yes.  
 14 Q Did anyone at pupil services or the  
 15 superintendent's office ever review that curriculum,  
 16 or were you -- you had the authority to just create  
 17 it?  
 18 A Yeah. Just -- you basically did -- I did  
 19 it based on a need of what was going on in the  
 20 school. If phone calls weren't being made, then  
 21 that's when I came in there, to basically -- it  
 22 wasn't even really a training at that point. It was

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12:57:59 1 15-minute session, like, "Can you come and  
 2 address" -- "I'm going to give you 10 minutes."  
 3 "I'm going to give you 15 minutes. I need you to  
 4 talk to them about reporting the attendance or  
 5 making calls to parents" and things like that.  
 6 Q Are you doing okay? Do you need a break?  
 7 A No. I'm good. It's just that that  
 8 sandwich -- I'm sorry.  
 9 Q That's all right. You're fine.  
 10 A I'm sorry.  
 11 Q That's all right.  
 12 A I told you I was 52.  
 13 Q I don't believe you, but that's fine.  
 14 We'll let it slide.  
 15 Were staff required to attend those  
 16 trainings you put on?  
 17 A Staff meetings are required for them to  
 18 go. Now, unless they have a reason why they can't  
 19 stay or if they're out that day, then they're not  
 20 there. But generally they have to go.  
 21 There are rules with the -- those  
 22 meetings as well. Like, they're not allowed to go

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12:59:32 1 just basically a, "Listen. This is what we need to  
 2 happen. This is what isn't happening. We need to  
 3 get some of these things done."  
 4 I might ask another teacher who's amazing  
 5 at doing it, "How do you keep up with," you know,  
 6 like, that sort of thing. So it was more  
 7 discussiony. You know what I mean?  
 8 Q Okay. Thank you.  
 9 A Uh-huh.  
 10 Q Ms. Isom, who determines what training is  
 11 provided to school administrators?  
 12 A To the -- what training is provided to  
 13 them?  
 14 Q Uh-huh.  
 15 A I have no idea.  
 16 Q Okay.  
 17 A That's way over my pay grade. I know  
 18 what my check look like.  
 19 Q Do you know who determines what training  
 20 is provided to faculty?  
 21 A I don't, no. I don't know if there are  
 22 certain things that the principal is told that they

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13:00:21 1 have to do.  
 2 Q Okay.  
 3 A I'm not sure.  
 4 Q Okay. So as a PPW during your time at  
 5 Friendly, did you ever request changes to the  
 6 training provided to school faculty or staff?  
 7 A No. I might just say, "Can I get  
 8 15 minutes on Thursday?" You know what I mean?  
 9 Sometimes they would call me and say, "Is  
 10 there anything you need to talk to the staff about?  
 11 We're having a meeting on" -- you know.  
 12 Q Okay.  
 13 A And I might come in there for a few  
 14 minutes and say, "Listen." Dah, dah, dah, dah, you  
 15 know, whatever it is. But, again, it-- they're  
 16 usually pretty brief.  
 17 Q Okay. Thank you.  
 18 As a PPW, could you request -- could you  
 19 request certain training be provided to school  
 20 staff?  
 21 A I could suggest it. Uh-huh.  
 22 Q And could you suggest it based on what

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13:02:37 1 those situations.  
 2 But, no, that wouldn't have been  
 3 something that would have been told to PPW to  
 4 definitely do.  
 5 Q Okay. Thank you.  
 6 So I want to return to the training that  
 7 you recall happening that related to diversity  
 8 inclusion.  
 9 A Uh-huh.  
 10 Q Do you recall attending a mandatory  
 11 training on or around March of 2015 --  
 12 A That has to be it.  
 13 Q -- about diversity in schools that was  
 14 facilitated by Major Irene Burke?  
 15 A An outside person. Yes, I do remember.  
 16 That's who it was. Okay.  
 17 Q What do you remember about that training?  
 18 A I remember that she came in. And when  
 19 she came in, everyone had to listen to what she was  
 20 saying.  
 21 I remember at one point someone got  
 22 offended by the conversation and saying, you know,

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13:01:13 1 you were observing in the school --  
 2 A Uh-huh.  
 3 Q -- environment?  
 4 A Uh-huh. I could suggest it. Uh-huh.  
 5 Q Did you ever provide training to students  
 6 other than the code of conduct quarterly trainings?  
 7 A No.  
 8 Q Okay. Did -- during your time at  
 9 Friendly, Ms. Isom, did Mr. Adams or Ms. Pope-Brown  
 10 or any other assistant principal, during this time  
 11 period we're talking about, ever ask you directly to  
 12 coordinate a training session for students or  
 13 faculty and staff regarding diversity and inclusion  
 14 issues about transgender people?  
 15 A No.  
 16 Q Okay.  
 17 A That would have been probably more of a  
 18 guidance counselor. I wonder if they do cover  
 19 that -- when they do classroom guidance, they do  
 20 that. They go around, and they -- you know, they  
 21 meet with students. Usually it's in the English  
 22 classes that -- I don't know if that happened in

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13:03:26 1 like, "What is this about? Why are we doing this?"  
 2 You know, that sort of thing happened. People were  
 3 not -- some people were not happy about it.  
 4 There's always a group, so we had that  
 5 group that kind of, like, kicked up a little bit of  
 6 dust -- and maybe a while into it.  
 7 Q Do you remember who was in that group or  
 8 who objected to the content?  
 9 A I was in the front of the room, and  
 10 they -- we were in the library. I can't exactly  
 11 tell you who it was, but they were in towards the  
 12 back.  
 13 And, again, I don't remember a lot of the  
 14 staff, people's names. I'm horrible with that.  
 15 Q That's okay.  
 16 Do you remember the format of the  
 17 training?  
 18 A She came in. The only thing I can  
 19 remember is that she came in, and she was -- and if  
 20 you ask me specifically what she was talking about,  
 21 I could never tell you.  
 22 But she came in, and she just basically

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13:04:17 1 had a conversation about what gay people have gone  
 2 through. And I want to say that she talked about  
 3 some specific cases of things that have happened to  
 4 gay people. I believe it was like that.  
 5 Q Okay. Do you remember who was required  
 6 to attend this training?  
 7 A I thought it was everyone.  
 8 Q Okay.  
 9 A Because I remember Mr. Adams asking me to  
 10 stay and go to that training.  
 11 Q Okay. Was the training after school  
 12 hours?  
 13 A It was after school.  
 14 Q After the school day hours.  
 15 A Uh-huh. It was after school.  
 16 Q Okay. Do you remember asking any  
 17 questions or making any comments during the  
 18 training?  
 19 A Uh-uh.  
 20 Q Okay. Do you remember how long the  
 21 training lasted?  
 22 A Maybe an hour. It wasn't forever.

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13:06:11 1 Q Okay.  
 2 A I don't even remember if that was the  
 3 regular staff meeting or if that was an additional  
 4 training. I can't remember. But I know it  
 5 happened.  
 6 Q Okay. So we're almost done. So I want  
 7 to thank you for being here --  
 8 A Thank you.  
 9 Q -- and being so wonderful to speak with  
 10 today.  
 11 I want to follow up about --  
 12 A I thought you were going to lower the  
 13 boom after all that.  
 14 Go ahead.  
 15 Q Pardon?  
 16 Oh, no. No. No. No.  
 17 A That was the setup.  
 18 (Discussion off the record.)  
 19 BY MR. CHARLES:  
 20 Q I wanted to follow up about something you  
 21 mentioned earlier about --  
 22 A Okay.

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13:05:13 1 Q Do you remember any discussion about  
 2 transgender people during that training?  
 3 A The whole -- the whole meeting was  
 4 about -- I had -- because sometimes people get very  
 5 upset if you mess up the -- the -- you know, the  
 6 acronyms. But --  
 7 Q Oh, sure.  
 8 A Yeah, they really do. And, like, you  
 9 don't even mean any harm. You know what I mean?  
 10 Q Of course.  
 11 A But it was just about all the LGBTQ  
 12 issues. It was about all of that. Yeah.  
 13 Q Okay. Do you recall, were other topics  
 14 discussed during that hour besides the ones we've  
 15 already talked about?  
 16 A No. That's -- the whole meeting was for  
 17 that.  
 18 Q Okay.  
 19 A There might have been announcements at  
 20 the beginning. I don't remember. But that's --  
 21 Q Okay.  
 22 A That was the reason it was called.

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13:06:57 1 Q -- feeling overwhelmed with a large  
 2 caseload and multiple schools.  
 3 A Uh-huh.  
 4 Q Do you feel a large caseload affects your  
 5 ability to address all the issues with student  
 6 behavior you wish you could in your work?  
 7 A Oh, absolutely. Absolutely. There's  
 8 just so many social issues that are going on now in  
 9 the county. And not to put a place down, but now  
 10 that DC is becoming richer and we're getting the  
 11 influx of students from -- from DC, that just  
 12 really -- I mean, school was not their main focus,  
 13 we have a bunch of social issues that are coming  
 14 into the county. So you can't -- you can't get to  
 15 all of them. You can't.  
 16 And then -- so I hate to say this, but  
 17 the truth is some of the times you have to focus on  
 18 the bigger issues. Sometimes you can't get to all  
 19 of them. We have to refer a kid out that you wish  
 20 you could help, or you wish you could do more with  
 21 an organization, or you wish you could mentor more  
 22 kids. It's always like that. There's always so

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13:07:57 1 much to do.  
 2 Q Did you feel overwhelmed with your  
 3 caseload while you were at Friendly?  
 4 A Not overwhelmed, but I did feel -- I'm a  
 5 person that's going to -- if I don't get it done,  
 6 it's on -- here I go again.  
 7 Q I'm sorry. This was the boom. This was  
 8 what I was worried about.  
 9 Do you want to take a minute?  
 10 A It's on me.  
 11 Uh-uh.  
 12 Q Okay. Go ahead.  
 13 A I'm just going to tell you. I'm going to  
 14 talk through it.  
 15 I feel like it's on me. I also told you  
 16 I did foster care, and I did therapeutic kids.  
 17 Teenagers are my ministry. That doesn't mean I  
 18 don't say bad words and do those things. But I  
 19 am -- I'm sorry. I am -- I take those teenage  
 20 issues -- because once I hear their story, I'm done.  
 21 And -- and I'm so involved in them.  
 22 And so, of course, when there's a

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13:09:50 1 out too thin.  
 2 So some of my overwhelmness is my fault  
 3 because sometimes you need to say, "Let the guidance  
 4 counselor handle that." Let so-and-so and  
 5 such-and-such handle that.  
 6 But if a student came to you directly,  
 7 you wouldn't want to send them to somebody else  
 8 because they chose you. But you couldn't -- you  
 9 couldn't take on another thing because you just --  
 10 it was just too much, you know. So in that way --  
 11 I'm so sorry you-all.  
 12 Q You don't need to be sorry.  
 13 I'm sorry --  
 14 A Kids have a lot of problems nowadays --  
 15 Q Of course.  
 16 A -- and I feel horrible for them. And,  
 17 you know, they're forced to be adults, and they're  
 18 children. They don't even know how to be an adult.  
 19 So that's what we kind of try and help them with.  
 20 Q Of course. Yeah.  
 21 A There's so many social issues. I always  
 22 say to kids, "I shouldn't even exist. There

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13:08:52 1 situation that goes on and I can't personally  
 2 help -- because I used to have a serious problem  
 3 with saying no, and you really need to say no and  
 4 let somebody else do it because you don't have the  
 5 time to put in it.  
 6 But I feel bad because some kids would  
 7 really want me to respond personally, and I couldn't  
 8 always do that. Kids really -- a lot those -- a lot  
 9 of kids in a lot of those situations were drawn to  
 10 me because of the way, you know, I take on stuff  
 11 and -- you know, like, they're like, "She's the cool  
 12 lady who dresses real cool." I mean, you know what  
 13 I'm saying?  
 14 Q Sure.  
 15 A So those kids, they like me. And, you  
 16 know, maybe I was bold. Maybe I was that way. But  
 17 sometimes I couldn't always do it. And I always  
 18 feel so bad.  
 19 So things happen that just -- if I just  
 20 take it -- but -- so that's what I mean when I say  
 21 I'm not overwhelmed, but maybe I am. I don't know.  
 22 Maybe I'm just overworked or I want to spread myself

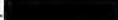
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13:10:36 1 shouldn't be a PPW."  
 2 But it's like the county hires us to be  
 3 an additional mother. Because now what they're  
 4 having us do is mother children because their moms  
 5 are not -- a lot of kids' moms -- you-all know. A  
 6 lot of kids' moms are not doing their thing, so you  
 7 feel so bad and then you get personally involved.  
 8 Or somebody becomes homeless or -- so I  
 9 get so many bad stories sometimes, like -- before --  
 10 this never happened before. But this year, like, I  
 11 had a meltdown. I called my supervisor just to say,  
 12 "I need to take a couple days off." But instead, as  
 13 soon as she answered the phone, I start talking,  
 14 this is what happened.  
 15 So sometimes I do take on a little bit  
 16 too much. I hear so many bad stories all the time  
 17 that it does weigh on you, you know.  
 18 Q Of course.  
 19 A And I love my job, even though I'm  
 20 blubbering over here.  
 21 Q That's very fair.  
 22 A I love my job. I say to my supervisor

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13:11:24 1 all the time, you know, I love my job, you know,  
 2 and – but, unfortunately, my job is to work with  
 3 troubled youth. It's kids that are in really – you  
 4 know, I'm looking at a kid, and I'm like, gosh,  
 5 you're not going to graduate from high school. It's  
 6 just not going to happen.  
 7 I know it. I'm not saying it out loud.  
 8 But I'm just like – and then things are just going  
 9 to continue to be bad, and I know it, you know. So  
 10 it's those sort of things that kind of – are really  
 11 heavy on your heart.  
 12 I had a group of transgender kids at  
 13 Surrattsville. This is post this. I'm just giving  
 14   
 15  
 16  
 17  
 18 So it was their senior year. And they  
 19 came back to school.  
 20 And I said, "Hey, look. You've missed  
 21 50 days of school so far."  
 22 "Well, I'm getting ready to drop out of

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13:12:21 1 school because I'm going to be on a reality show."  
 2 And I was just like – she was in – she  
 3 was – that was one of –  She was  
 4 in the registrar's office; right? The door closes  
 5 this way.  
 6 And I said, "You're not going to drop out  
 7 of school. And that's the stupidest thing I ever  
 8 heard."  
 9 And I, like, went off on this kid.  
 10 And I said, "And I know you're mad; so  
 11 I'll slam the door on my own face."  
 12 And I pulled the door – slammed the  
 13 door.  
 14 But that's the person that they're going  
 15 to be drawn to, because, like, Ms. Isom is crazy;  
 16 so -- so then the twin – the other twin is still  
 17 coming to my office.  
 18 And so the other one –  comes to my  
 19 door to say, "You ready?" because they had a half  
 20 day. And went down to say you know you want to come  
 21 in here. And then she came on in. And then the  
 22 next thing you know, she was coming to my office

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13:13:00 1 every day again.  
 2 But it's just those situations like that.  
 3 So when you can turn that thing around and those two  
 4 students walk across the stage – and they were  
 5 popular; so they got cheered on. They're  
 6 transgender kids, and they're popular. So watching  
 7 them be able to move transgender to an area where  
 8 they are so accepted was so amazing to me. I mean,  
 9 what powerful girls those are.  
 10 I mean, they moved to Atlanta now. Their  
 11 mother comes up to the school because she still has  
 12 a kid there. And she tells me, you know, how they  
 13 still want to be on reality TV. But – fine.  
 14 Whatever. Just as long as you're working. And  
 15 they're doing fine, you know.  
 16 So don't – when you get those success  
 17 stories, it feels – it feels good.  
 18 Q Yeah.  
 19 A You don't get a whole bunch of them.  
 20 So anyway, that's what I'm just telling  
 21 you is that the situations are just so heavy. And I  
 22 think because I'm so personally invested in Prince

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13:13:50 1 George's County and Friendly High School – because  
 2 I owed them. I was bad when I was there. What?  
 3 You kidding? Not you.  
 4 So – so I just – I like the fact that  
 5 the county developed a person that made it out. I  
 6 used to get in trouble in school. I don't know why  
 7 I'm telling you all this. I used to get in trouble  
 8 in school all the time.  
 9 And people thought that my assistant  
 10 principal at Crossland was like my aunt or  
 11 something, because we were together all the time.  
 12 And she would catch me going to school in the  
 13 hallway with a million kids and be like,  
 14 "Jocelyn Isom, come here."  
 15 I be like, "Why you calling me? What  
 16 about the rest of them?"  
 17 Because we were going to do something we  
 18 had no business – she could smell it, you know.  
 19 Years later I'm in an elevator down  
 20 Crystal City, and this person in the back of the  
 21 elevator – I'm with my friends, and she says,  
 22 "Jocelyn Isom"

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13:14:34 1 I turned around.  
 2 I was like, "Oh, my, God. Ms. Jowers."  
 3 I said, "Guess what I do for a living?"  
 4 And she said, "You're a schoolteacher."  
 5 And I couldn't believe --  
 6 Q Wow.  
 7 A -- that she saw that in me. And I want  
 8 to be that person that sees that in these kids.  
 9 So that's -- that's what I'm telling you.  
 10 That's really what the PPW job is, is to grab those  
 11 kids and just really try your best to get them out  
 12 of school, you know.  
 13 Because if they're not coming to school  
 14 or, like, had a bunch of social issues at home, you  
 15 got to get them to. And it's horrible. They have  
 16 to ignore those issues during the day, because I  
 17 need you to focus as a student.  
 18 And it's hard to sound that way to them  
 19 because I'm like maybe I'm not being sensitive. I  
 20 need you to focus from 7:45 to 2:25. That's what I  
 21 say all the time.  
 22 And I said, "And after that, all this

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13:15:16 1 stuff, we're going to try and deal with it. But I  
 2 really need you to graduate from high school.  
 3 because this can't keep happening generation after  
 4 generation."  
 5 That's what the PPW does. That's the  
 6 PPW's job; so -- it's -- because that's why I say  
 7 it's so hard to explain this job. Because in one  
 8 case you sound like you're fighting for the kids,  
 9 but sometimes you sound like you fighting against  
 10 them, you know. But you're really not, you know;  
 11 so -- anyway.  
 12 Sorry. I love my job.  
 13 Q No need to be sorry.  
 14 A I think it's important.  
 15 Q Yeah, I think it is too.  
 16 A I think it's important.  
 17 Q And I appreciate you sharing with us.  
 18 A Sorry.  
 19 Q That's okay. That's fine.  
 20 A Ya'll would never forget the lady that  
 21 cried.  
 22 Q That's all right.

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13:15:52 1 A I think about Jennifer from time to time,  
 2 and I really want you-all -- I don't know if you're  
 3 able to, but please tell her I said hello.  
 4 MR. MOGUL: We will.  
 5 BY MR. CHARLES:  
 6 Q We can do that.  
 7 A Please tell her I said hello; that I  
 8 asked about her.  
 9 Q Of course.  
 10 A Because I worried about her too.  
 11 Q Yeah.  
 12 A I did.  
 13 Q Thank you for that.  
 14 A Yeah. Sorry.  
 15 Q That's okay. I just have maybe one or  
 16 two more questions.  
 17 A Just take your time, please.  
 18 Q Amit might have a couple, and we'll call  
 19 it good.  
 20 A Okay.  
 21 Q Do you think -- given what you just told  
 22 us --

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13:16:23 1 A Yes.  
 2 Q -- right? -- about the importance of your  
 3 job --  
 4 A Yes.  
 5 Q -- how -- there's just no way for you to  
 6 do it all yourself?  
 7 A There's no way. You can't do it.  
 8 Q Do you think it would be helpful if  
 9 Prince George's County hired more PPWs?  
 10 A Absolutely.  
 11 Q Do you think it would have been --  
 12 A At one time there were more. At one time  
 13 there was over a hundred of us. Now there's  
 14 40-something. The job is still split up among all  
 15 of us. The same number of schools, all those kids.  
 16 That's where it gets worse because you really can't.  
 17 You can't.  
 18 And we just doing the best we can with  
 19 the resources that we have, because, unfortunately,  
 20 the world doesn't pay you to love people. You know  
 21 what I'm saying? Love doesn't pay. So they're  
 22 going to cut those funds. And, unfortunately, they

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13:17:04 1 need more people in the classroom than they do in  
 2 other areas. It just becomes that honest focus, you  
 3 know.  
 4 There have been a lot of budget cuts in  
 5 education unlike I've ever seen over the last  
 6 ten years, you know.  
 7 Q Yeah.  
 8 So thinking specifically about Friendly  
 9 when you were there 2011 to 2016, do you think, when  
 10 you were there, it would have been helpful to have  
 11 more PPWs?  
 12 A I'm going to tell you why I'm going to  
 13 say no. I'm going to say no only because we had  
 14 professional school counselors that worked really  
 15 well with me. So we were almost tackling the same  
 16 job over and over again. Like, this person might  
 17 deal with something, a case, where I was able to let  
 18 go of a particular thing because -- "Oh, my, God.  
 19 You with Ms. Caporatta? Good. Stick with  
 20 Ms. Caporatta."  
 21 So that way I knew that this person was  
 22 taking care of those things.

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13:18:40 1 view her?  
 2 A They liked her.  
 3 Q Why is that?  
 4 A She was a good teacher.  
 5 Ms. Eller's class -- if I had to go -- so  
 6 a lot of times if I picked up a student, if they  
 7 were in Ms. Eller's class, I would go in Ms. Eller's  
 8 class and end up leaning against the wall, right?  
 9 So Ms. Eller would say, "You need  
 10 anything?"  
 11 I'm like, "Yeah. I'm here to pick up  
 12 [REDACTED] but keep going," because her lessons were  
 13 so -- she was really a good teacher; so -- she  
 14 was -- she was good. So she became a favorite  
 15 teacher of students, Yeah.  
 16 And she even got honors' classes.  
 17 Q Were the students supportive of her --  
 18 A Yeah. They liked her.  
 19 Q -- as transgender?  
 20 A They liked her.  
 21 She had a rough start when she first  
 22 came. And I would say, honestly -- when school

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13:17:57 1 In all areas I'm sure that we need more  
 2 staff that's not possible to do. I would like to  
 3 have five PPWs at a school. I really would. So  
 4 what I'm asking for -- if I would have asked for  
 5 something like that or to think that way, I know  
 6 that's impossible thinking. You understand what I  
 7 mean? It's just not going to happen.  
 8 Q Yeah.  
 9 A Yeah.  
 10 Q Okay.  
 11 MR. CHARLES: Okay. I think that's it.  
 12 THE WITNESS: That's it?  
 13 MR. SHARMA: Ms. Isom --  
 14 MR. CHARLES: For us.  
 15 THE WITNESS: I enjoyed that, though.  
 16 Thank you. I don't know if I was supposed to.  
 17 MR. SHARMA: I have a few questions.  
 18 THE WITNESS: Yes.  
 19 EXAMINATION  
 20 BY MR. SHARMA:  
 21 Q What was the general consensus, if you  
 22 had one, for students and Ms. Eller? How did they

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13:19:22 1 first started, there would be a new set of  
 2 ninth graders. So those ninth graders might act up  
 3 for a minute. She never got assigned ninth grade  
 4 students, I don't believe.  
 5 But anyway, the -- the student -- the  
 6 older kids were superduper cool with Ms. Eller. So  
 7 they would cut it out quickly, and life would go on.  
 8 But I'm sure that there were still  
 9 probably some students that -- you know.  
 10 Q You mentioned a board that Ms. Eller had  
 11 in her classroom.  
 12 A Uh-huh.  
 13 Q How large was the board, if you --  
 14 A It was a whole --  
 15 Q A whole --  
 16 A It was as wide as that, maybe.  
 17 Q Maybe about 6 feet wide?  
 18 A Yeah. It's -- because they -- because  
 19 there would -- there would be -- you know how the  
 20 classroom -- well, the way the classrooms are set up  
 21 there, it would be a board, a board, a board, a  
 22 board, a board. And they would be separated by this

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13:20:02 1 little line thing. So that's how you would make  
 2 your divisions of a board.  
 3 Q I see.  
 4 A So she had one whole board that was  
 5 dedicated to hotlines and -- for various things. It  
 6 was different gay organizations, gay support  
 7 organizations, suicide hotlines, stuff like that.  
 8 Q And was that board in her classroom the  
 9 entire length of her tenure --  
 10 A Uh-huh.  
 11 Q -- at Friendly High School?  
 12 Is that a "yes"?  
 13 A Yes.  
 14 Q Okay.  
 15 A Yes.  
 16 I'm sorry. Here we go again.  
 17 Q And how did you become aware of the  
 18 board? Is it just by walking in or --  
 19 A Uh-huh.  
 20 Q Okay.  
 21 A Uh-huh.  
 22 Q And was her classroom open to other

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13:20:31 1 students to take advantage of those resources --  
 2 A Yes.  
 3 Q -- that were on the board?  
 4 A Uh-huh. Uh-huh. Yes. Yes. Yes.  
 5 See, here I go again.  
 6 Yes. Yes. She was very open and --  
 7 Q Open with what?  
 8 A She had an organization called Circle.  
 9 And it was for gay and lesbian students. And I  
 10 remember they had a fundraiser and stuff like that.  
 11 They did -- we had -- what's the thing called  
 12 before -- football -- what's the thing before the  
 13 football game? Tailgate. We had a tailgate party.  
 14 We had a tailgate party before  
 15 homecoming. So they had, like, a table set up. It  
 16 was real pretty. And they had the rainbow colors.  
 17 And there was, like, cupcakes and stuff. And they  
 18 were doing -- they were raising funds for different  
 19 things that they did.  
 20 Q Circle is a school organization that she  
 21 was a part of?  
 22 A She started. Uh-huh.

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13:21:21 1 Q Is that different from Caring Colors, or  
 2 is that the same thing?  
 3 A Oh, that's what it is. Caring Colors.  
 4 I'm sorry.  
 5 Q No worries.  
 6 A That's what it is, Caring Colors.  
 7 Q The incident that you mentioned with the  
 8 student recording Ms. Eller with an iPad --  
 9 A Uh-huh.  
 10 Q -- do you recall what happened to that  
 11 student as a result of that incident?  
 12 A So this is what's crazy. There was a  
 13 blind spot on the camera. So the kid -- so they was  
 14 seeing the kid record the child, and then --  
 15 "recording that child" -- the child record  
 16 Ms. Eller. And then on the video, the kid  
 17 disappeared.  
 18 So we kept saying how can you just  
 19 disappear -- just disappear in thin air.  
 20 So we finally figured out that the kid  
 21 ran up the steps. It took us maybe about a week to  
 22 come to that conclusion. And when the kid came off

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13:22:09 1 the steps, it was that same -- anyway, I can't  
 2 remember exactly what his name was, but he had  
 3 pulled off the hood and all that stuff. And we got  
 4 him. And he got suspended from school.  
 5 Q Do you know how long the suspension was?  
 6 A Yeah. I think he got, like, five days.  
 7 Q And who suspended him?  
 8 Was it one of the --  
 9 A Mr. Adams.  
 10 Q "Mr. Adams." Okay.  
 11 A Because we were trying to figure it out  
 12 forever. How did that kid disappear? It was, like,  
 13 freaking us out. Because in our mind, the kid was  
 14 running so fast he had to have turned the corner.  
 15 But, actually, this kid was running fast, but some  
 16 kind of twist -- kind of way it twisted and went up  
 17 the steps, which was almost impossible.  
 18 Q There was a discussion earlier about  
 19 PS-74s.  
 20 A Uh-huh.  
 21 Q I think one of the things you mentioned  
 22 was that the PS-74s were returned back to the

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13:22:50 1 teacher.  
 2 A Yeah. They had -- they're supposed to --  
 3 the bottom part, they're supposed to tell the  
 4 teacher what happened or -- and then give it back to  
 5 the teacher. That's what's supposed to happen.  
 6 I've heard some teachers complain at  
 7 every school I've been that they don't get them back  
 8 all the time.  
 9 Q In addition to the trainings that you  
 10 spoke about, is it not true that all staff members  
 11 of Prince County Public Schools have to go through  
 12 mandatory training at the beginning of each school  
 13 year?  
 14 A Uh-huh.  
 15 Q What does that training consist of?  
 16 A So there are different ones. And then  
 17 there's one online called SafeSchools which actually  
 18 goes into gay and lesbian issues -- it does -- and  
 19 workplace harassment. So it goes all over the place  
 20 when it comes down to harassment.  
 21 We have that training. They get -- I'm  
 22 trying to remember. They have to do -- there's a

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13:23:41 1 mandatory child protection services one. Then  
 2 there's blood pathogens. Those are -- those are  
 3 done with someone standing in front of them actually  
 4 doing those particular trainings. You have to sign  
 5 on those and everything.  
 6 Q So the SafeSchool training that's  
 7 provided to all staff members, that has a component  
 8 about diversity?  
 9 A Yes.  
 10 Q Nondiscrimination?  
 11 A Uh-huh.  
 12 Q "Yes"?  
 13 A Yes. Yes.  
 14 I'm sorry.  
 15 Q Anti-harassment policy?  
 16 A Yes.  
 17 Q Okay. And do you recall whether it goes  
 18 into specific categories of protected persons?  
 19 A It does, because what it does on there is  
 20 it has, like -- people act out some of the scenes,  
 21 and then you're supposed to say, "Is this  
 22 harassment?" Dah, dah, dah, so-and-so. You pick

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13:24:25 1 one. Like, the -- during it, they have these little  
 2 quizzes.  
 3 Q You also mentioned that the student code  
 4 of conduct is your bible --  
 5 A Uh-huh.  
 6 Q -- I think is what you said.  
 7 And the student code of conduct -- that  
 8 has a component within it that prohibits  
 9 discrimination on --  
 10 A Uh-huh.  
 11 Q -- any protected class --  
 12 A Yes.  
 13 Q -- or persons --  
 14 A Yes.  
 15 Q -- is that correct?  
 16 A It lists them.  
 17 Q Okay.  
 18 A Uh-huh.  
 19 Q And it also has a component about  
 20 anti-harassment; correct?  
 21 A Yes. Yes.  
 22 Q About -- there's an anti- -- there's a

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13:24:55 1 bullying form that somebody can fill out if they  
 2 feel --  
 3 A It's inside the book. Uh-huh. Along  
 4 with that memorandum where they say that they're not  
 5 going to do particular things. Uh-huh.  
 6 Q You also mentioned something about the  
 7 P-Team training?  
 8 A Yes.  
 9 Q What is that?  
 10 A So we used to have -- the county stopped  
 11 it, but we used to have where the guidance  
 12 counselors -- all the people that are -- interact  
 13 with students socially: The guidance counselor,  
 14 PPW, the social workers, the parent liaisons. And  
 15 in some cases, it will be the school nurse, but you  
 16 can't have the school nurse out of the school very  
 17 often. So they could work in conjunction with one  
 18 another in order to support a student.  
 19 Q And these trainings happen two to three  
 20 times a year?  
 21 A They used to happen -- yeah, like that, a  
 22 couple of years ago, but they've stopped. But

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13:25:44 1 during this time, we were having them.  
 2 Q Okay. And what was covered specifically  
 3 in these types of trainings two or three times a  
 4 year?  
 5 A Different social issues that were going  
 6 on with kids. Definitely, one of the things we're  
 7 always going to talk about is the sex-trafficking  
 8 issue, because that is crazy, you know. And  
 9 recognizing what sex trafficking is. So we have  
 10 that one. That was a big one. We still do that one  
 11 pretty big every year.  
 12 Q Would diversity issues come up?  
 13 A Yes.  
 14 Q Nondiscrimination issues?  
 15 A Yes.  
 16 I'm trying to think if -- attendance,  
 17 abuse. It would be all the things that that  
 18 particular group of people needed to hear together.  
 19 Q And this P-Team training was in addition  
 20 to the PPW training that met every --  
 21 A Yes.  
 22 Q Where you said earlier that there was

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13:27:31 1 you decide how you going to go, if you're going to  
 2 go long or short?  
 3 So we had that relationship. And, like,  
 4 she used to come to extra parties. Like, if we had  
 5 a Christmas shindig and she would come and bring a  
 6 girlfriend, or the prom and all that kind of stuff.  
 7 So our relationship was always really good.  
 8 And one day we had this boy who had come  
 9 from -- he had been locked up for three years. He  
 10 had an IEP. But if an IEP is written by a different  
 11 state, it has to be rewritten for Maryland. This  
 12 boy needed to go to a level-five school.  
 13 Do I need to explain what that is,  
 14 like --  
 15 Q Sure.  
 16 A Okay. So a level-five school is -- okay.  
 17 One of the ones we have in particular is called High  
 18 Roads, if you want to look up High Roads. So it's  
 19 for students that have emotional issues that -- and  
 20 it requires a certain number hour of therapy that we  
 21 don't provide at a school. We cut off at a certain  
 22 amount, and I'm not exactly sure what that number is

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13:26:43 1 sensitivity training for students and sometimes  
 2 staff?  
 3 A Yes.  
 4 So if we had a P-Team training that  
 5 month, we didn't have a PPW training that month.  
 6 That would take the place of that particular one.  
 7 Q Was there ever an incident between you  
 8 and Ms. Eller?  
 9 A Yeah, there was.  
 10 Q Tell me about that incident.  
 11 When was it?  
 12 A It was -- I want to say it was maybe my  
 13 last year there. Again, I get -- like, it was  
 14 between my third and my last year there. And me and  
 15 Ms. Eller were real cool. Like, Ms. -- she would  
 16 ask me about lipstick and how do you decide what wig  
 17 you're going to wear. Because, like, I look this  
 18 way, and tomorrow I will walk right past you guys  
 19 and you would not even -- I'm not kidding you.  
 20 Like, I'm going to have a whole different head of  
 21 hair on.  
 22 And she would ask me stuff like how would

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13:28:17 1 because special education is not my -- that's not my  
 2 focus on my job; so I don't want to answer a  
 3 question I can't.  
 4 But if they need a certain amount of  
 5 therapy, we can't provide it; so we send them to a  
 6 therapeutic session -- setting. But in order to do  
 7 that, you have to go to this meeting -- like, the  
 8 IEP meeting, which is the -- you know, that's the  
 9 document that we used, the Individual Education  
 10 Plan, for students who have disabilities.  
 11 But if the IEP shows the kid needs a  
 12 certain amount of therapy, we have to go to a CIEP,  
 13 which is the county IEP team meeting. So the IEP  
 14 has to be rewritten for the State of Maryland. And  
 15 then we have to present it to them. And then from  
 16 there they decide if the student is eligible to go  
 17 to a level-five school, what needs to be done to the  
 18 IEP to clean it up in order for them go and where  
 19 they're going to go. But in order to get to that  
 20 process, it might take two and a half months.  
 21 Well, this boy's IEP showed that he was  
 22 particularly dangerous. He was dangerous; so you

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13:29:08 1 really didn't want to ruffle his feathers. And,  
 2 unfortunately, that's the neighborhood school. So  
 3 he had to go to Friendly until we got him to that  
 4 program.  
 5 So he would go to class. He would put  
 6 his head down. And so some of the teachers were  
 7 complaining about it because if an administrator  
 8 walks in the room and catches a kid's head down, the  
 9 teacher's going to pay the price for that because  
 10 you -- you're not supposed to be teaching people  
 11 that are sleeping and be cool with it.  
 12 So people were complaining about the kid.  
 13 So Mr. Adams was like, "Let the teachers know that  
 14 if I walk into a room and this kid has their head  
 15 down, that there's not going to be any particular  
 16 thing," because I was concerned about it too,  
 17 because even when I talked to the boy, he was  
 18 aggressive. He's aggressive. I had to tell him I  
 19 was there to support, but I was uncomfortable with  
 20 him.  
 21 So when I went from classroom to  
 22 classroom, when I got to Ms. Eller's class, I told

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13:30:34 1 And she came out the classroom and got in my face,  
 2 like, within inches of my face saying some stuff.  
 3 And I said, "Hey, look. Get away from  
 4 me. I don't feel comfortable. Like, go"; right?  
 5 And then she went outside because it was  
 6 dismissal time. And she told the police officer to  
 7 arrest me. And she said the opposite. She said  
 8 that I came crashing out the classroom and put my  
 9 finger in her face and did these things. It was the  
 10 total opposite of what happened. Well, they were  
 11 able to go look at the video and see that she had  
 12 lied.  
 13 The next day we had a meeting with  
 14 Mr. Adams because -- well, we have to have a meeting  
 15 to make sure that the staff is okay.  
 16 So it was me, Mr. Adams -- he had called  
 17 me, told me, "I need you here 7:30," because I'm  
 18 always late for work. I'm not going to lie.  
 19 So I got there at 7:30. Ms. Eller was  
 20 there. Mr. Adams was there. I think we had to do  
 21 it later. Something happened.  
 22 Well, anyway, when we had the meeting,

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13:29:54 1 her the same thing that I had told other teachers.  
 2 And she was like, "No. That's not  
 3 acceptable. You know he has his head down."  
 4 I was like, "There's no way. He's  
 5 dangerous. He's going to be gone soon. Just let  
 6 him come in."  
 7 The only reason why he was coming there  
 8 was because he had an ankle monitor. If he didn't  
 9 have that, he wouldn't have come.  
 10 So she started telling me I wasn't doing  
 11 my job. And the way she was talking to me was  
 12 really disrespectful.  
 13 So I said, "You know what? I'm going to  
 14 go before I say something I don't have any business  
 15 saying to you."  
 16 So I got up, and I left the room. And I  
 17 was going around that same little corner. And I  
 18 heard all -- because she was grading papers. There  
 19 was papers all over a student's desk that she had in  
 20 front of her. I heard that stuff go crashing down.  
 21 And I knew -- I said let me turn around  
 22 because I don't want anybody coming up on my back.

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13:31:24 1 Mr. Adams kept saying, "Which one of you-all want to  
 2 go first?"  
 3 And I said, "Ms. Eller can go first."  
 4 So she started telling this story of her  
 5 experience at Friendly.  
 6 And I said, "We're not here to talk about  
 7 your experience at Friendly. We're here to talk  
 8 about what happened yesterday," because she told the  
 9 people to lock me up, to put me in jail.  
 10 And she -- and so then she kept taking a  
 11 deep breath, and she would talk a little bit. And  
 12 then she would keep trying to go to this experience  
 13 at Friendly.  
 14 And I said, "We are here to talk about  
 15 what happened yesterday, or I have to go," because  
 16 this thing is fresh. It just happened.  
 17 And so finally she starts telling a  
 18 story. Now it's another story. It's not even the  
 19 one that she went outside and told the police  
 20 officers. Now we're telling a whole different story  
 21 of what happened.  
 22 So when it was over -- when her -- when

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13:32:10 1 she was finished talking, Mr. Adams said, "Ms. Isom,  
 2 did you want to tell your version of the story?"  
 3 And instead of telling my version of the  
 4 story, I told Ms. Eller, I said, "You know what?  
 5 I'm glad you made up another story because that  
 6 let's me know that you knew you were wrong for what  
 7 happened yesterday. Me and you were really cool.  
 8 Now I kind of have to pull back my relationship from  
 9 you because you can't tell somebody to have me  
 10 arrested and we go on. Even if I want to, I can't,  
 11 because at this point, you" -- what if they believed  
 12 her and put handcuffs on me and took me out of the  
 13 building, you know? It changed everything.  
 14 And so even though we were still  
 15 speaking, and I wanted us to have a better  
 16 relationship like we used to, I just couldn't. We  
 17 would joke -- we would joke around. We got back to  
 18 the area where we could joke around, but it just  
 19 never was the same as it was originally, because now  
 20 I got -- I got to protect myself from you at this  
 21 point. You went too far.  
 22 Q So Ms. Eller lied to the police?

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13:33:53 1 really -- it hurt me. It did.  
 2 Q Are you aware of any type of discipline  
 3 that was imposed on Ms. Eller as a result of the  
 4 incident?  
 5 A I have no idea.  
 6 Q You never asked Mr. Adams?  
 7 A No. I know that Mr. Adams told me that,  
 8 when I left the room, Ms. Eller said she was real  
 9 sorry because she had hurt Ms. Isom. That's what  
 10 she had told him. But after that, I just -- I  
 11 didn't involve myself in it.  
 12 They wouldn't have told me what a  
 13 discipline was for another staff member anyway.  
 14 Q Okay.  
 15 A Yeah, you can't do that.  
 16 Q Was that the only incident between you  
 17 and Ms. Eller?  
 18 A Uh-huh.  
 19 Q And do you recall what year that was?  
 20 A It was in my third or my fourth year  
 21 there. Yeah. Yeah.  
 22 So even though we were talking, sometimes

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13:33:05 1 A She lied to the police. She went  
 2 straight outside and told them people to arrest me  
 3 because I had confronted her and threatened her.  
 4 Q And did Ms. Eller lie to Mr. Adams?  
 5 A And then Ms. Eller told an additional --  
 6 a different story to Mr. Adams the next day.  
 7 Q Did Mr. Adams ever have an occasion to  
 8 look at the video to see what actually transpired,  
 9 to your knowledge?  
 10 A I think he did. I -- yeah. Because they  
 11 even asked me did I want to see it. And I was like,  
 12 I don't need to see it. I already know.  
 13 But then when they told me what happened,  
 14 I was just like -- I was really hurt. My feelings  
 15 were hurt by that. It wasn't even so much of the  
 16 lie. It was just, like, not Ms. Eller. Like, why  
 17 you doing that to me? you know. Uh-uh.  
 18 Because I felt like I had supported her.  
 19 I always went to Ms. Eller's class to see if  
 20 Ms. Eller was cool. I always sat in her class to  
 21 tell her, "You are an amazing teacher," you know,  
 22 that sort of thing. And then for her to do that, it

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13:34:36 1 joke around or walk up the hallway together and  
 2 communicate, it wasn't the same anymore. It wasn't  
 3 the same.  
 4 Q Did Ms. Eller ever apologize to you for  
 5 that incident?  
 6 A No.  
 7 MR. SHARMA: I don't have --  
 8 THE WITNESS: Not personally. My -- I  
 9 accepted the apology as far as what she said to  
 10 Mr. Adams at the end, "I really hurt Ms. Isom"  
 11 That made me feel better. Like, at least you're  
 12 kind of admitting that you did something wrong. So  
 13 that was good enough. But the relationship was not  
 14 going to be the exact same anymore.  
 15 BY MR. SHARMA:  
 16 Q Despite the incident, did you continue to  
 17 support her in your capacity as pupil --  
 18 A Yeah. But I didn't go around there to  
 19 have those personal are-you-okay conversations  
 20 anymore. That was different. That was -- that part  
 21 was different. I didn't do that anymore.  
 22 Q Did you ever treat Ms. Eller different

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13:45:15 1 because of her transgender status?  
 2 A Uh-uh. No. Uh-uh. No.  
 3 I believe people have the right to be who  
 4 they are.  
 5 One of my favorite cousins, Sam, he is  
 6 gay. He's not transgender, but he is gay. And only  
 7 dates his boyfriend.  
 8 [REDACTED] again, please look at the  
 9 Robert Irvine Show. It is crazy. Those students  
 10 feel so close to me, you know. Like -- uh-uh.  
 11 [REDACTED] I still want to know what happened with  
 12 him. So I just don't -- I don't feel that way, you  
 13 know.  
 14 Q Do you believe that the administration  
 15 generally tried to help Ms. Eller?  
 16 A Yeah. Mr. Adams didn't have to send me  
 17 around that corner to go do that. He didn't have  
 18 to. And it was my option to do it. I could have  
 19 said, "I'm not doing that. That's not part of my  
 20 job."  
 21 But he really, you know, would look out  
 22 and make sure Ms. Eller was okay, to me.

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13:36:12 1 MR. SHARMA: I don't have anything else  
 2 MR. MOGUL: Ms. Isom, I just have a few  
 3 more questions.  
 4 THE WITNESS: Sure.  
 5 MR. MOGUL: Sorry about that.  
 6 THE WITNESS: No problem.  
 7 MR. SHARMA: Excuse me.  
 8 It's unusual, and I think it actually  
 9 violates the rules for two different attorneys to  
 10 ask questions in the same deposition.  
 11 MR. MOGUL: So you don't want me to --  
 12 MR. CHARLES: Are you filing an  
 13 objection?  
 14 MR. SHARMA: You can.  
 15 MR. MOGUL: If you don't want me to do  
 16 it, we'll take a break.  
 17 MR. SHARMA: Yeah, let's take a break.  
 18 I'll see if I can look up the rule. Or unless he  
 19 wants to ask it, then I'll withdraw my objection.  
 20 MR. MOGUL: Go ahead and look up the  
 21 rule, but we'll take a break.  
 22 MR. SHARMA: Sure.

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13:36:41 1 (A recess was taken.)  
 2 EXAMINATION  
 3 BY MR. CHARLES:  
 4 Q Okay.  
 5 A All right.  
 6 Q So you mentioned, when you were talking  
 7 about the incident with the student --  
 8 A Uh-huh.  
 9 Q -- that there were blind spots on the  
 10 video camera.  
 11 A Uh-huh.  
 12 Q You seem surprised when you mentioned  
 13 that.  
 14 A Yeah. So it just -- the way the camera  
 15 was angled, I thought that it was getting  
 16 everything. But, you know, just a small twist in a  
 17 camera, and you're going to have a spot that's --  
 18 you could have a spot that's possibly not covered.  
 19 So right before you go into the  
 20 staircase, that's where the camera disappeared, the  
 21 focus. The camera almost seemed like it needed to  
 22 be bent down a little bit more. Maybe they needed

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13:45:05 1 another camera on that hallway. Not sure, but --  
 2 Q And that was by Ms. Eller's classroom?  
 3 A That was by Ms. Eller's classroom.  
 4 Q And --  
 5 A It was by -- it was really by guidance.  
 6 Ms. Eller's classroom, you could see that clearly on  
 7 the camera. But when you went up to the hallway and  
 8 you got to the guidance door, that's where you  
 9 couldn't be seen, because guidance was right under  
 10 that camera.  
 11 Q And that was by the stairwell?  
 12 A Yes.  
 13 So there's a guidance door and a  
 14 stair -- the guidance door and the stairwell were  
 15 right beside each other.  
 16 Q And it sounds like that was not very  
 17 common for there to be a blind spot on the camera.  
 18 A I don't know because I don't work with  
 19 the security cameras. But usually if something  
 20 happens -- sometimes it's too far down the hallway  
 21 for you to see an incident. Because sometimes I  
 22 needed a camera in order to investigate an incident.

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13:45:50 1 And, like -- they were like, "This is the  
 2 closest camera we have to that spot."  
 3 So sometimes that happened. But that  
 4 blind spot was a surprise because of what happened  
 5 with that young man, that he just disappeared. So  
 6 it was just like -- you know,  
 7 Q Yeah.  
 8 A It's still crazy for somebody to -- like,  
 9 you walking out the door, and then, all of a sudden,  
 10 you disappear. And then we like, "Wait. Hold up.  
 11 Where'd he go?" You understand what I mean?  
 12 Q Totally.  
 13 A I think they adjusted it after that,  
 14 but --  
 15 Q But you don't know for sure if they  
 16 adjusted it after that?  
 17 A Uh-uh.  
 18 Q Okay.  
 19 A Uh-uh.  
 20 Q So going back to the P-Team training.  
 21 A Okay.  
 22 Q Does P-Team stand for Pupil Team?

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13:47:16 1 Q Okay.  
 2 A No. No.  
 3 Q Do you remember if those -- if the  
 4 scenarios that now are happening, not during the  
 5 time that you were at Friendly --  
 6 A Sure.  
 7 Q -- specifically involved transgender  
 8 people?  
 9 A There's a transgender scenario.  
 10 Q But those trainings didn't exist when you  
 11 were at Friendly?  
 12 A No. Not online. Uh-uh.  
 13 Q And finally, did you personally hear  
 14 Ms. Eller speak to the police officers after that  
 15 incident that you mentioned?  
 16 A No. But there were several of them out  
 17 there. They were all standing together when she did  
 18 it. So it was -- it was humiliating.  
 19 Q Of course.  
 20 But you didn't personally hear her --  
 21 A No.  
 22 Q -- say anything to them?

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13:46:27 1 A It's pupil services. We were all part of  
 2 pupil services.  
 3 Q And you--all only -- that was because  
 4 you--all dealt with students --  
 5 A Yes.  
 6 Q -- not with staff?  
 7 A Yes. Especially if we had, like --  
 8 immunization is a big issue at the beginning of the  
 9 year. So they tell us how to deal with that and,  
 10 you know, that sort of thing, because kids are going  
 11 to be out of school because of it.  
 12 Q And so you--all were only discussing  
 13 diversity, nondiscrimination, those issues as it  
 14 related to students, not as it related to staff?  
 15 A Yeah. Not as they -- no.  
 16 Q Okay. Do you remember when the  
 17 SafeSchools training started?  
 18 A Did we start using -- I know we used it  
 19 last year.  
 20 Q Did the SafeSchools training start while  
 21 you were at Friendly?  
 22 A No.

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13:47:48 1 A No.  
 2 Q Okay.  
 3 MR. CHARLES: That's it.  
 4 MR. SHARMA: Well, let me just follow-up.  
 5 MR. CHARLES: No, I don't think you get  
 6 to follow-up.  
 7 MR. SHARMA: I think I do.  
 8 MR. CHARLES: No. I don't think you do.  
 9 Objection.  
 10 MR. SHARMA: Okay. Well, then, you can  
 11 object.  
 12 EXAMINATION  
 13 BY MR. SHARMA:  
 14 Q How do you know that she told the police  
 15 that --  
 16 MR. CHARLES: Objection.  
 17 BY MR. SHARMA:  
 18 Q -- to arrest you?  
 19 A Because they came straight in --  
 20 MR. CHARLES: Objection.  
 21 THE WITNESS: -- there to let me know.  
 22 MR. CHARLES: Objection.

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13:48:01 1 THE WITNESS: They came straight in there  
 2 to let me know. Right from being outside, they came  
 3 straight in there to let me know.  
 4 BY MR. SHARMA:  
 5 Q Let you know what?  
 6 A That Ms. Eller asked -- said that you  
 7 harassed her -- that you threatened her, and she  
 8 wanted you arrested.  
 9 So then they were -- they were in the  
 10 back, and they were looking for the camera footage  
 11 of it. And they looked for it, and they saw that  
 12 the opposite had happened; so --  
 13 Q Now, the SafeSchools training that you  
 14 talked --  
 15 MR. CHARLES: Objection.  
 16 BY MR. SHARMA:  
 17 Q -- about earlier --  
 18 MR. SHARMA: May I ask the question?  
 19 Then you can object, for the record.  
 20 MR. CHARLES: I'm going to object  
 21 whenever I want to.  
 22 MR. SHARMA: You're not going to let me

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13:48:30 1 ask the questions?  
 2 MR. CHARLES: I'm objecting. And you can  
 3 continue your question.  
 4 MR. SHARMA: But I'm in the middle of my  
 5 question when you're objecting. That's the problem.  
 6 THE WITNESS: I'm permitted to answer;  
 7 right? Because now you-all have me confused.  
 8 BY MR. SHARMA:  
 9 Q You're permitted.  
 10 A Okay. Okay. All right.  
 11 Q So the SafeSchools training that you said  
 12 just started maybe a year or two ago -- is that  
 13 correct?  
 14 A Uhh-huh.  
 15 Q Was there another type of mandatory  
 16 training prior to that training being --  
 17 A Right.  
 18 Q -- implemented?  
 19 MR. CHARLES: Objection.  
 20 Keep going.  
 21 THE WITNESS: Okay. They would do  
 22 these -- these trainings. They're probably able to

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13:49:03 1 cover more area now because of SafeSchools, because,  
 2 of course, it's online. And we have certain dates  
 3 that we have to complete it. As a matter of fact,  
 4 the 31st of January, we just had to do another  
 5 setup done. They had to be done by then.  
 6 But -- yes. So, basically, those areas  
 7 got covered, for the most part. There's some stuff  
 8 about, like, computer usage and stuff like that that  
 9 was briefly covered. But they -- now they were able  
 10 to do an entire training on it.  
 11 BY MR. SHARMA:  
 12 Q And was discrimination --  
 13 nondiscrimination --  
 14 A Oh, that's big on it.  
 15 Q Okay. And that was covered prior to the  
 16 Safe --  
 17 MR. CHARLES: Objection.  
 18 BY MR. SHARMA:  
 19 Q -- Schools training?  
 20 A Yeah. It was -- yeah.  
 21 BY MR. SHARMA:  
 22 Q And anti-harassment, was that covered?

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13:49:40 1 MR. CHARLES: Objection.  
 2 THE WITNESS: Yes.  
 3 BY MR. SHARMA:  
 4 Q I'm sorry. He's just being --  
 5 A It's okay. It's okay. That's his job.  
 6 Q He's not letting me ask my question.  
 7 MR. CHARLES: I'm letting him finish each  
 8 question, and then I'm --  
 9 MR. SHARMA: Yeah. Why don't you just  
 10 pause and let him make an objection, and then we can  
 11 make sure the record is clean.  
 12 We haven't had a problem since, but I  
 13 don't know what's going on today.  
 14 THE WITNESS: I thought we were all going  
 15 out for drinks after this.  
 16 MR. SHARMA: I guess not.  
 17 BY MR. SHARMA:  
 18 Q Was there an anti-bullying component of  
 19 training prior to SafeSchools?  
 20 A Yes, there was.  
 21 MR. CHARLES: Objection.  
 22

201

13:50:05 1 BY MR. SHARMA:  
 2 Q And what format was the training provided  
 3 prior to SafeSchools?  
 4 MR. CHARLES: Objection.  
 5 THE WITNESS: Okay. They would talk  
 6 about -- of course, they're going to list the -- you  
 7 can't harass people over particular things and that.  
 8 They didn't go superduper in depth as far  
 9 as I know in the schools. But, again, with the  
 10 PPWs, we did a lot of it. But in the schools, I'm  
 11 not exactly sure how much they covered. But I know  
 12 that they had it because they all knew about the  
 13 bullying form, you know, and the rules that go  
 14 around, you know, suggesting kids go to bully and  
 15 harassment and all that kind of stuff.  
 16 BY MR. SHARMA:  
 17 Q This is an in-person training?  
 18 A Yeah. Uh-huh.  
 19 Q Done at the schools?  
 20 A Done at the schools. It was done by the  
 21 principal.  
 22 MR. SHARMA: That's all I have.

202

13:51:20 1 THE WITNESS: Uh-huh.  
 2 MR. SHARMA: Or you can waive that right.  
 3 So the choice is yours.  
 4 THE WITNESS: I'm not reading that.  
 5 MR. SHARMA: So I guess she'll waive.  
 6 THE WITNESS: Yeah, I'll waive.  
 7 (Off the record at 1:51 p.m.)  
 8 (Signature was waived.)  
 9  
 10  
 11  
 12  
 13  
 14  
 15  
 16  
 17  
 18  
 19  
 20  
 21  
 22

204

13:50:46 1 Thank you.  
 2 And he may have some additional questions  
 3 based on what I asked.  
 4 THE WITNESS: Come on, guys. The lemon  
 5 drops. The lemon drops.  
 6 Just kidding.  
 7 MR. SHARMA: No questions?  
 8 I'll advise her, then.  
 9 MR. MOGUL: No, we don't have any  
 10 questions.  
 11 MR. SHARMA: Okay. We can go off.  
 12 MR. CHARLES: I don't know why you're  
 13 asking him because I'm the one asking the questions.  
 14 MR. SHARMA: I asked both of you, and you  
 15 turned --  
 16 MR. CHARLES: No, because he --  
 17 MR. SHARMA: -- the other way.  
 18 MR. CHARLES: -- didn't speak. I was  
 19 looking at him; so ask me.  
 20 MR. SHARMA: You have the right to read  
 21 and review your transcript prior to it becoming  
 22 final.

203

13:51:30 1  
 2 Certificate of shorthand reporter - notary public  
 3 I, Susan E. Alldridge, Registered Professional  
 4 Reporter, Certified Shorthand Reporter, the officer  
 5 before whom the foregoing deposition was taken, do  
 6 hereby certify that the foregoing transcript is a  
 7 true and correct record of the testimony given; that  
 8 said testimony was taken by me stenographically and  
 9 thereafter reduced to typewriting under my  
 10 supervision; that reading and signing was not  
 11 requested; and that I am neither counsel for or  
 12 related to, nor employed by any of the parties to  
 13 this case and have no interest, financial or  
 14 otherwise, in its outcome.  
 15 IN WITNESS WHEREOF, I have hereunto set my hand  
 16 and affixed my notarial seal this 10th day of  
 17 February 2020.  
 18  
 19  
 20 \_\_\_\_\_  
 21 Susan E. Alldridge, RPR  
 22 NOTARY PUBLIC IN AND FOR THE DISTRICT OF COLUMBIA

205

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

JENNIFER ELLER

Plaintiff,

v.

PRINCE GEORGE'S COUNTY PUBLIC  
SCHOOLS, PRINCE GEORGE'S COUNTY  
BOARD OF EDUCATION, and MONICA  
GOLDSOIN in her official capacity

Defendants.

Case Number: 18-cv-03649-TDC/TJS

**EXHIBIT 15**

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND

JENNIFER ELLER,  
Plaintiff,

v.

PRINCE GEORGE'S COUNTY PUBLIC  
SCHOOLS, et al.,  
Defendants.

Civil Action No. 18-cv-03649-TDC

**DECLARATION OF JENNIFER ELLER**  
**IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT**

I, Jennifer Eller, do hereby declare and state:

1. I am over the age of eighteen and competent to give testimony. The information contained in this Declaration is based upon my personal knowledge. I submit this Declaration in connection with the above-captioned action.

2. My name is Jennifer Eller, and I am a career educator. I am a former teacher at Kenmoor Middle School, Friendly High School, and James Madison Middle School, three schools within the Prince George's County Public Schools ("PGCPS") district.

3. I am the Plaintiff in this action. As a PGCPS teacher, I suffered from repeated, hurtful discrimination and harassment because I am a transgender woman, and when I repeatedly asked my supervisors to address this harassment, they failed to take any meaningful action. It was my hope to work within the PGCPS system to stop the harassment and help the district become a more inclusive environment that would be friendly to LGBTQ (lesbian, gay, bisexual, transgender, and/or queer) students, teachers, and staff. Unfortunately, the stonewalling I met at

every level made clear that my supervisors were unwilling to make any effort to stop the abuse I was suffering or, indeed, to make any productive change. Ultimately, my supervisors' inattention over many years and their efforts to punish me for complaining about the hostile work environment they allowed to fester left me no other choice than to resign to protect my own physical and mental health. That is why I filed first a charge of discrimination with the Equal Employment Opportunity Commission ("EEOC"), and after it issued a Letter of Determination confirming that I had been subject to a hostile work environment and retaliation, this lawsuit. My purpose in this case is the same as when I attempted to work with my supervisors as an employee: to address the discrimination and harassment that I encountered and to improve the conditions for all PGPCS LGBTQ students, teachers, and staff.

### **My Background**

4. I am a transgender woman, which means that my gender identity is female, but I was assigned the sex of male at birth. Like many other transgender individuals, it took me many years to come to terms with my gender identity. This process, for me and many others, was made extraordinarily difficult by societal pressure and the fear of discrimination and violent harassment.

5. I received a degree in Religious Studies with a minor in Psychology in May 2000 from Augustana Lutheran Liberal Arts College. Youth ministry was a primary focus of my studies at Augustana because I felt a strong call to work with children and provide them with support to build a life worth living and sharing with others. I served as a tutor at a Christian adolescent and family counseling center from May 2000 to May 2001 and as a classroom assistant at Axtell Park Middle School in Sioux Falls, South Dakota from November 2000 to May 2001. In 2006, I earned a Master of Fine Arts in Creative Writing, Fiction from Minnesota State University, Mankato.

6. After deciding to pursue my passions for teaching and literature and desire to work with children, I applied for a teaching certification in Maryland through The New Teacher Project. In the summer of 2008, I went through extensive training with The New Teacher Project. I received an initial certification from The New Teacher Project in August 2008 and received a permanent teaching certification from the Project after completing additional coursework and one year on the job. The Project takes highly skilled educators who have not worked in a school system before, trains them, and places them in a high-needs school. In 2008, I also received a certificate of achievement for being in the top one percent in the nation on the Praxis English content exam for teaching English Language Arts.

#### **Employment History at PGCPs**

7. In fall 2008, I started teaching seventh grade Reading/English Language Arts for gifted and talented students at Kenmoor Middle School in PGCPs. During the 2009-2010 and 2010-2011 academic school years, I taught Reading/English Language Arts in the eighth grade, also at Kenmoor Middle School. During the 2009-2010 academic school year, I co-taught one special education English class with a certified special education instructor. I consistently received excellent evaluations from my students and supervisors at Kenmoor Middle School. In each of my classroom observations at Kenmoor Middle School, I received either “highly proficient” or “proficient” scores in each category of evaluation. I also served as the Chair of the English Department at Kenmoor Middle School during the 2010-2011 academic school year.

8. From fall 2011 through spring 2016, I taught at Friendly High School in PGCPs. At Friendly High School, I taught tenth, eleventh, and twelfth grade Reading/English Language Arts from fall 2011 through spring 2016. I taught AP English Language during the 2013-2014 academic school year and AP English Literature during the 2012-2013 and 2013-2014 academic school years. In 2015, while teaching at Friendly High School, I took a class on teaching AP

English Literature from Goucher College. From 2011 through 2015, I consistently received positive evaluations from my students and supervisors at Friendly High School. However, on June 15, 2016, after I had filed a Discrimination or Harassment Incident Report against Ms. Robinson and a Charge of Discrimination with the EEOC, I received low performance scores in my final evaluation at Friendly High School. I was categorized as an “ineffective” teacher. There were no observations of my classroom in the 2015-2016 school year.

9. In the 2016-2017 school year, I taught Reading/English Language Arts at James Madison Middle School until I was forced to take a leave of absence in October 2016 in order to protect my health. I resigned from my position at James Madison Middle School on August 18, 2017.

### **Social Transition**

10. Starting in 2011, I began socially transitioning to live as my authentic self, consistent with my female gender identity. Social transitioning can include, for example, “coming out” to friends and family, requesting that others use gender pronouns that match the transgender person’s gender identity, socially and/or legally changing the transgender person’s name to a name typically associated with their gender identity, wearing clothing and adopting grooming habits stereotypically associated with the individual’s gender identity, and otherwise living consistent with one’s gender identity. I had privately explored the idea of a social transition since the time I was in college and graduate school, including discussing socially transitioning with a therapist, professor, and friends.

11. On April 28, 2011, I sent an email to the principal of Kenmoor Middle School, Maha Fadli, and Kathleen Gregory, the coordinator of the gifted and talented program, regarding my transition. I informed them that I needed to speak with them regarding a personal matter and that the issue would require flexibility and open-mindedness by staff, parents, and students.

When I spoke with Ms. Fadli, I informed her that I would be transitioning eventually, but that I was not yet ready to discuss the subject with others at the school.

12. Around this time in Spring 2011, I started wearing a few articles of subtly feminine attire to work, such as Oxford-shirt style blouses and women's slacks.

13. On May 2-3, 2011, I further discussed my social transition with Ms. Fadli. I asked Ms. Fadli if she could facilitate a meeting with my teaching team to discuss my social transition. Ms. Fadli informed me that she would arrange such a meeting. I wanted to be able to explain my transition to my teaching team in my own words and be available to answer any questions.

14. However, before I had the opportunity to discuss my social transition with my teaching team and without discussing it with me beforehand, Ms. Fadli informed me that she had told the teaching team about my transition in my absence. I was disappointed that she did not allow me to be a part of the discussion introducing my transition to my coworkers. The news of my transition then spread to other members of the staff and to some staff at other schools without my ability to be involved in that conversation.

15. When I started my social transition, I did not expect that every individual I encountered in the workplace would immediately be comfortable, accept me, and immediately use my new legal name and gender pronouns correctly without mistake. I understood then that it would take some time for my supervisors and coworkers to adapt, and that maybe some students would not react well to my transition. But what I did expect was that my employer would be supportive of my transition. I expected that supervisors at PGCPs would provide faculty, staff, and students with the training and tools needed to interact with transgender individuals like myself. And I expected that my supervisors would support me in taking action when members

of the PGCPs community discriminated against me or harassed me because I am transgender. This did not happen.

### **Harassment at Kenmoor Middle School**

16. Almost immediately after my transition became publicly known, I became subject to harassment by students and staff at Kenmoor, resulting in a hostile work environment that caused me emotional distress, humiliation, embarrassment, stigmatization, a loss of dignity, and an eventual loss of employment. Treatment towards me by staff and students dramatically changed after my social transition, with behavior by others that included constant misgendering and name calling, as well as inappropriate questions about my physical appearance and medical transition. This harassment included, but was not limited to, being referred to as a “fag” and “tranny,” being compared to a pedophile, staff gossiping about and making crude jokes about my gender, students interrupting class to ask questions about whether people “beat me up” when I was in public, and people grabbing and touching me in the hallways. I include some details about what I suffered below, but this does not, and cannot, account for the almost daily abuse and harassment I suffered following my transition.

17. On May 4, 2011, just after Ms. Fadli had informed Kenmoor staff about my transition, I overheard faculty saying “. . . thinks he’s a girl . . . . I know. It’s disgusting,” at the teacher’s lounge. In one instance, I walked into the teacher’s lounge to use the photocopier, and I had to turn around and walk out because I could hear the staff talking about me and how distressing it was to them that “he thinks he’s a woman.”

18. Staff discussed my transition in front of students, resulting in harassment from the student population. For example, one Kenmoor staff member, Kathleen Gregory, asked me if I was going to have a sex transition while we were walking into the cafeteria with students, which

was overheard and spread among the students and resulted in subsequent harassment and name calling.

19. On May 4, 2011, two female students entered my classroom, stared at me, and did not respond when I asked if they needed anything. That had never occurred before my transition, and I perceived that I was being treated as a spectacle.

20. Soon thereafter, students began calling me a fag, gay, homo, tranny, and a “Booty Warrior,” a derogatory term that students told me referred to a pedophile or a child molester.

21. As additional staff and students discussed my transition, individuals increasingly questioned numerous aspects of my appearance, including the length of my hair, the type of shirt I was wearing, and whether or not I wore a bra. Students also questioned me regarding physical surgeries and changes to align my physical appearance with my gender identity and one grabbed my hand to ask if I had on nail polish. These remarks and behavior caused me extreme discomfort and emotional distress.

22. I informed Ms. Fadli of each of these events, including in a May 17, 2011 email, told her that this behavior was unacceptable and that things had been taken too far, and requested that action be taken. I also informed Ms. Fadli that the actions of students and teachers had caused me great distress. However, to the best of my knowledge, Ms. Fadli took no action.

23. Some behavior by staff and faculty was particularly hurtful.

- a) One English teacher, Courtney Ball, insisted on calling me by my former name, despite my transition and the fact that I had my first name legally changed. She did so pointedly and publicly in staff meetings and the end of year staff event. She made a number of derogatory comments and jokes about my hormone replacement therapy and my appearance. Although I did not file a formal

Discrimination or Incident Harassment Report against Ms. Ball, I discussed her behavior with Ms. Fadli and human resources staff and explained how hurtful and uncomfortable her behavior made me feel.

- b) Mr. Beall, the math teacher for gifted and talented eighth grade students, stopped talking with me entirely after learning of my transition. This made it difficult for me to perform my job because Mr. Beall and I worked together as a team.
- c) Yet another English teacher, Mr. Enchelmaier, made light of my gender identity and said that I would never be anything other than my former name.
- d) I informed Ms. Fadli and human resources staff about these teachers' behavior. Elizabeth Davis, a PGCPs employee in a central office role, also was involved in conversations in which I brought up my colleagues' behavior. I told Ms. Fadli, Ms. Davis, and human resources staff how hurtful and uncomfortable my colleagues' behavior made me and requested their assistance in easing the transition process for me with my colleagues.

24. I was also subject to constant misgendering after my transition.

#### **Lack of Response from Defendants While I Taught at Kenmoor Middle School**

25. The administration at Kenmoor provided no support for my transition, even after I had informed them of the constant harassment I had faced during my first few weeks after my transition was made public. Instead, a human resources representative enlisted to help me through the transition demanded that I present as male and told me that a note from my therapist regarding my transition was "garbage." An eighth grade assistant principal told me not to wear skirts or dresses because it would make people uncomfortable, even though I had not worn a dress or skirt to work.

26. I am not aware that any discipline was ever administered to any faculty, staff, or student who had misgendered me or who had made derogatory statements either to my face or behind my back.

27. Instead, the focus of the administration's response was entirely on how I could present less of a problem for them by either hiding my transition or removing me from the school. In a May 24, 2011 meeting between Ms. Fadli, Ms. Davis, PGCPD employee James Whattam, and myself, less than a month after I had socially transitioned, we discussed a possible transfer to a new school, and I was informed that I would be updated on the transfer process by mid-June. At this same meeting, it was agreed upon that: (a) my clothing choice and presentation style would be based on "androgynous qualities" that did not present as overly masculine or feminine; (b) that my shoe choice would be limited to tennis shoes, sneakers, androgynous flats, and androgynous heeled boots; (c) that a "natural look" make-up style would be permissible; and (d) that I could not wear nail polish.

28. I was thereafter informed that I would be starting at Friendly High School during the 2011-2012 school year. Although I agreed that a transfer could be beneficial given how the environment had deteriorated at Kenmoor, I had no say over where I would be transferred.

### **Harassment at Friendly High School**

29. I began the 2011-2012 school year at Friendly High School. From the first day, I presented consistent with my true gender: female. Although I did not discuss my transgender status with the principal and staff upon my arrival at Friendly High School, my transgender status was known to them upon my arrival.

30. The harassment that staff and students directed towards me significantly worsened after my transfer to Friendly High School. I was subject to verbal and physical assault and constant misgendering during my time at Friendly High School from 2011-2016. This

harassment caused me severe distress and created an environment where I felt unsafe. I eventually became filled with anxiety going to work, and it was difficult to find the strength to come into school and face the constant harassment directed towards me.

31. For example, in August 2011, I reported to Principal Raynah Adams that two female students referred to me as “the he/she,” and after an earthquake that occurred in August 2011, students began saying that the earthquake was God’s punishment for Defendants’ hiring of a “tranny.” Students continuously referred to me as “mister” and “he” during my first weeks at Friendly High. By December of 2011, some students would ask me about the appearance of my genitals, and others would run unannounced into my classroom, scream “he” or “shim,” and immediately run away. On January 9, 2012, a student stood in my doorway shouting “tranny” and “transvestite” as I was lecturing.

32. After I caught one student cheating on his final exams, the student became increasingly aggressive and belligerent towards me, continuing to advance toward me as I backed away from him to the point where he cornered me by the door of the classroom. He then opened the door and shoved me out of it. It was clear to me that this student’s actions were driven by discrimination against me because of my transgender status because this student had also verbally harassed me throughout the school year; would talk over me in class, ignored the assigned work, and said on two occasions that his mother would get his grade changed because of a “tranny” teaching the class.

33. A number of students also walked into my classroom and stared at me in an offensive and intimidating manner. It was unheard of for students who are not on the assigned roster to walk into a classroom and stare at the teacher from a distance of a few feet; this was intimidating behavior addressed specifically toward me because of my transgender status.

34. I also faced harassment from teachers during the 2011-2012 school year. One teacher referred to me as a he-she and blocked my entry into the teacher's lounge. Another teacher asked me if it was worth all the disruption I was causing just so I could wear a skirt. The mathematics teacher, Mr. Ecton, had told his AP class that I should have waited until I looked more like a woman before coming to teach; he never elaborated what he meant by "looking more like a woman."

35. During the 2012-2013 school year, I was asked questions including: "do you have a dick," "do you bleed," and "have you cut it off." Students referred to me as a tranny, he-she, chick with dick, shemale, and it, and I was constantly misgendered. Students would make comments regarding my appearance, including what my face looked like and the size of my feet. One student entered my classroom and asked, "What the hell are you wearing?" One day after school, a student and his friends approached me in the parking lot and verbally assaulted me, including telling me that they would "rape" me and make me "their girlfriend," actions that were based on my transgender status. In December 2012, I met with a parent in the presence of other staff, and the parent informed everyone that she was filing a formal complaint that there was a "Tranny" in the classroom. The guidance secretary insisted on walking me to my car after the meeting because she was concerned that the parent might confront me in the parking lot. One teacher, Ms. Battle, also routinely misgendered me during this school year.

36. During the 2013-2014 school year, I suffered from constant misgendering, being stared at, and harassment in the hallways. I also experienced physical assault, including from a student who slammed his foot down on my foot and made a slur regarding my transgender status. Parents instructed their students to skip my class, filed complaints with the school board about my presence in the classroom, and misgendered me during parent-teacher conferences. I also

engaged in continued discussions with Human Resources to recognize my legal name on email and calendar services, which were visible to the public and a major source of continued discrimination and bigotry. Examples of harassment directed towards me during the 2013-2014 school year include the following:

- a) In fall 2013, students told me that I was “messed up,” “so fucked up” and to “get the fuck out of my way” because I was transgender. Students also asked inappropriate questions including “How much do you charge?”, seeming to imply that I was a prostitute, and “Did you cut it off?”, referring to genitalia.
- b) On October 23, 2013, I was walking down the hall and a student shouted insults and misgendered me from inside her classroom. The staff person in the room let her do this without correcting her or telling her to behave.
- c) Students physically threatened me while walking in the halls, including a student who whispered to me “you best watch yourself,” implying that I would be attacked. It was clear to me that these threats were made because I was transgender. The aggressive manner in which they approached (a slow, purposeful, stalking to intimidate), the extra stress placed on male pronouns and how they drew words out, e.g. sh-him, and how they would visibly and audibly hold their breath as they walked by or use their textbooks as blinders so they would not have to look at me, all indicated this was not typical oppositional teenage behavior but intentional harassment and threats rooted in discrimination.
- d) In one instance, I was walking down the hallway at school, and a female student in a classroom saw me and yelled that Ms. Eller was “a man” and “a tranny.”

- e) Ms. Robinson, an assistant principal, and Ms. Claggett, another teacher in the English department, would routinely refer to me as “Mister” and would glare at me during staff meetings.

37. During the 2014-2015 school year, students became increasingly aggressive in their misgendering of me and in their general demeanor and attitude towards me. Parents also showed continued hostility towards me and continued to misgender me. For example:

- a) A parent who was upset with her child’s grades stood in the main office and said that the school had a pedophile working for them and talked about how she knew with certainty what was under my skirt.
- b) Ms. Robinson, who was responsible for overseeing the English Department and evaluating teachers within the department, repeatedly referred to me as “him,” “sir,” and, “mister” in front of other staff, despite that others in the room referred to me as she. I corrected Ms. Robinson multiple times.
- c) On March 16, 2015, I informed Mr. Adams that three boys in the hallway stopped to harass me while I was in my classroom. One of the boys poked his head in the room, and when I motioned for him to leave, he started laughing and said to his friends, “He a nigger. That man, he look just like a nigger.”
- d) On March 17, 2015, I called a student’s parents regarding the student’s misbehavior in class. As I attempted to talk with the parent, the parent stated, “Let’s get this straight: are you a man or a woman?” I was shocked at the brass nature of this, told the parent that this was a very offensive question given I had been introduced as Ms. Eller, and told the parent that I did not see how it was

relevant to our discussion. The parent responded that the question was “very relevant.”

- e) In June 2015, three girls were walking down the hallway, and one of them stopped in front of my open door and waggled her crotch at me while saying in a sing-song voice “Ho!” behavior that I believe was based on the fact that I was transgender and rooted in the stereotype that trans women are prostitutes.
- f) Ms. Claggett’s continued aggression towards me made me very uncomfortable. Ms. Claggett did not speak to me individually under any circumstances, even when we were in meetings, and acted as if I was not present.

38. During the 2015-2016 school year, I continued to be subjected to extreme harassment from students; parents, faculty, and staff repeatedly misgendered me. The harassment directed towards me by my first-period class was so serious that my administrator, Assistant Principal Ms. Pope-Brown, even had me leave the classroom for a period of several weeks near the end of the year in order to send in a long-term substitute to teach the students while I taught a small group of students who were not harassing me in a separate room. Another teacher, Mr. Reynolds, said that he heard students from that class talking about how they were going to do as much as possible to make me angry. The malicious harassment directed at me during this school year caused me severe emotional distress and created an environment in which I could no longer focus on my work or feel safe. The harassment, misgendering, and assault I experienced during this school year include the following:

- a) On August 18, 2015, a teacher referred to me as “sir” during a training session that I was leading.

- b) On August 27, 2015, two female students walking in the hallway between classes called me a “guy in a dress.”
- c) On September 1, 2015, while I was leaving the building at end of the day, a female student ran away as I walked by the area she was in. She was shouting, “Son, why you gotta keep moving this way! You scary as shit!” comments that I believe were made because I am transgender based on her emphasis on “son” and the judgmental up-and-down glare she gave me.
- d) On September 11, 2015, a student walked up to me in the hallway, screamed at me in a high-pitched wail, and then walked away.
- e) On September 22, 2015, as I was walking into the school in the morning, a student said, “Ew, it thinks it’s a girl. It’s wearing a skirt.”
- f) On September 23, 2015, as I was walking into school, a male student talking to a female student said, “Look at the tranny.” Later that day, a student passing me in the hallway stated, “Nasty freak.”
- g) On September 28, 2015, as I was waiting for the elevator, two female students were discussing me in a loud voice. One said to the other, “THAT is a HE/SHE.”
- h) On September 30, 2015, a male student said to others he was standing with, “Here comes freaky, don’t let it look at you,” a comment that I believe was made because I am transgender. He ducked and hid behind his friends as I walked past.
- i) On October 20, 2015, a male student in the hall stated to me, “Your sign’s wrong! It should say MISTER.”
- j) On October 26, 2015, when I confronted my colleague, Ms. Claggett, about her misgendering of a trans male student, the teacher argued that calling the student

his chosen name would be a “slap in my God’s face” and that she would not “push the Transgender Agenda.”

- k) On November 10, 2015, while I was walking into school, a young man stepped into my way, stepped onto my foot, and pushed down hard until I cried out in pain. When I asked if he would apologize, he glowered at me, said “tranny,” and walked away.
- l) On November 16, 2015, while I was entering the building, a male student shouted across the courtyard, “shemale!”
- m) On December 1, 2015, I overheard a male student state to another student, “He ugly as shit” after I found them wandering the halls. I had instructed them to go to the cafeteria, but they ignored my instructions, actions that I perceived to be based on my transgender status.
- n) On March 18, 2016, three students had to be removed from my class, including one who referred to me multiple times as “brah.”
- o) On April 7, 2016, I addressed a group of students who were loitering in the hallway next to my classroom. One girl openly stated that she was skipping class, spoke rudely to me, questioned how I spoke, and while leaving said that they should have “ignored him.” This disrespect and misgendering was based on my transgender status.
- p) On April 29, 2016, I informed Mr. Adams that I had to break up a group of students standing in the hallway. One of the girls misgendered me, referring to me as “he” twice. When I corrected her, she replied “Sorry, but you know . . .”

- q) On May 9, 2016, when I was substituting for another teacher's classes, one group of boys referred to me as "he" multiple times and kept glancing at me while singing "My ding-a-ling, won't you play with my ding-a-ling."
- r) On May 13, 2016, I was referred to as a he-she, and a student tried to obtain access to my classroom. I sent an email asking for urgent assistance.
- s) On May 25, 2016, I was repeatedly misgendered by a student. The student's statements included the following: "Not if I don't believe in it. If my opinion is you a boy then you is a boy;" "He is a man;" "He can't just change in sex;" and "If I don't believe he's a woman he ain't. You can tell just by looking at him he's a man."
- t) In other instances, I was called "tranny," "freak," and "thing" by students and parents.

39. This list is based on both my independent recollection and my review of numerous emails I sent to Mr. Adams and others at PGCPS to report and document some of the extreme and constant harassment I was experiencing. However, this list is by no means exhaustive. No list of individual incidents can accurately capture the environment of hate and abuse I endured.

#### **Lack of Response from Defendants While I Taught at Friendly High School**

40. Before I began at Friendly High School, Elizabeth Davis and human resources staff told me that they would ensure training concerning nondiscrimination of transgender individuals was provided there. This never occurred.

41. When I first arrived at Friendly High School, Mr. Adams referred me to the guidance counselor, Desiree Dent, about providing training related to transgender nondiscrimination. Ms. Dent declined to provide that training and informed me that she thought

it would be more appropriate for me to talk to students about the issue. This advice conflicted with Mr. Adams's direction that I not talk to students about my transgender status.

42. Over the years I taught at Friendly High School, I diligently reported acts of harassment to administrators, including by sending detailed accounts of discriminatory acts by email, discussing discriminatory acts in-person with the administration, and requesting follow-up action. In addition to detailing specific acts of harassment, I made clear to the administration that the environment within PGCPs was both transphobic and homophobic. For example, on December 13, 2013, I informed Mr. Adams that "the environment is both transphobic and homophobic. Transphobia (bigotry directed at a transgender individual for who they are) is what I have been experiencing and homophobia (bigotry directed at a homosexual individual for who they are attracted to) is what students have complained to Ms. Pope-Brown and me about experiencing...Please keep me updated on replies from Ms. Davis and Dr. Powell, as they come in."

43. However, administrators avoided taking action to prevent future harassment, and specific acts of student harassment, if addressed at all, were met with mild repercussions more appropriate for routine disrespect. The administration at Friendly High School was unresponsive to my reports of harassment, willfully ignored my repeated attempts to obtain training for students, faculty, and staff, and indeed discouraged me from reporting incidents of harassment in some instances.

44. At the time, the training for faculty and staff regarding LGBTQ diversity issues was essentially nonexistent. The only mention of the issue was in a short statement during required training that PGCPs does not discriminate on the basis of certain characteristics including sex, race, religion, and sexual orientation. This training never went into any more

detail than this plain articulation of a policy of nondiscrimination. For example, no training ever explained measures that faculty and staff could take to prevent discrimination against LGBTQ individuals or to provide for an inclusive environment for such individuals.

45. I firmly believe had there been training concerning transgender issues and gender diversity within PGCPs, I would have faced less harassment from staff and students and the number of instances in which I was misgendered would have greatly decreased. Training for students that specifically addressed harassment based on gender identity was particularly important due to the fact that new students come into the PGCPs system every year and even at the start of new semesters. Even if discipline alone could dissuade an offending student, it would not have a deterrent effect on new students. I also did not know the identity of each student who harassed me, as these events often happened in the halls or other locations outside my classroom by students I did not personally teach, making disciplinary efforts difficult and reinforcing the need for a diversity training.

46. In August 2012, I reached out to Mr. Adams multiple times to ask for a diversity/sensitivity assembly at which harassment and bullying would be discussed, which Mr. Adams and I had discussed near the end of the previous school year. However, the administration repeatedly ignored my recommendation that the school conduct a diversity training and/or assembly, despite the fact that I continued to bring it up with Mr. Adams for several years both in conversation and in e-mail. Mr. Adams later claimed to have discussed the diversity training with upper administration, who told him it would never happen. I also made the suggestion to Mr. Adams that a group such as GLAAD, an organization that supports the LGBTQ community through media, speak at the school about discrimination and harassment, but Mr. Adams ignored this suggestion also.

47. I also sent Mr. Adams a list of books and resources that could be added to the library about diversity issues for those wishing to know more, including introductory materials on transgender identities. At one point, Mr. Adams asked me to e-mail him a list of potential books and resources that could be added to the professional library and to the main student library. I sent him that list along with a list of potential people who could come in to speak for a diversity seminar, but he did not respond to that e-mail at any point thereafter and would not discuss it any further with me in person when I asked him about it.

48. I also suggested having a speaker at one of the staff meetings to address harassment and what staff and faculty can do to prevent harassment when it is happening. For example, I emailed Ms. Pope-Brown in November 2013 with recommendations on speakers who could come and speak about diversity and transgender awareness. Ms. Pope-Brown had expressed interest in doing an assembly-like presentation for students via their social studies classes. However, the only training that ever took place was a one-time brief training held in March 2015 with police officer Irene Burks after I had already filed my Discrimination or Harassment Incident Report concerning Ms. Robinson in February 2015. Though I had been sent home earlier that day due to a particularly aggressive phone call with a parent who insisted I was a man, I heard from Ms. Burks and others that the training was ineffectual, and that Mr. Adams escorted Ms. Burks out after a teacher stood up in the middle of the training and said “I don’t know why we have to go through changes for someone else. They are just too sensitive!” or something to that effect. Ms. Burks made a point of reaching out to me after her training to see how I was doing and told me that her opinion was that there was lackluster support for the training session and that she did not feel there was genuine encouragement to be professional. The training was never rescheduled.

49. It also took PGCPs approximately three years to update my primary email address to be disconnected with the first name I had before my transition, despite the fact that I asked PGCPs to update my email address with my new name in 2011 at the time I transitioned. As a result, PGCPs repeatedly revealed my transgender status to parents and students who corresponded with me by email or searched for my contact information. Even after the EEOC found reasonable cause to believe that I was subjected to harassment, discrimination, and retaliation, PGCPs's publicly accessible employee directory still listed me by my male birth name.

50. Thus, PGCPs repeatedly ignored my proactive and repeated attempts to remedy the harassment from which I was suffering. The administration failed to take any meaningful action in response to the pervasive attacks against me. When the administration did take action, it was arbitrary and only disciplinary in nature, and on an individual basis. A school secretary eventually told me that I should be transferred to a school where no one knew me.

#### **Filing of Disciplinary Reports While I Taught at Friendly High School**

51. In addition to reporting acts of harassment to administrators via email and other means, I also filled out PS-74 referral forms documenting the harassment that I experienced. Within PGCPs, it is common practice to complete PS-74 referral forms to document instances of student misbehavior and provide the completed form to an administrator. In some instances, I also provided a copy of the completed PS-74 form to Mr. Adams. However, teachers within PGCPs sometimes choose not to file PS-74 forms in instances where they prefer to deal with the situation directly in class or feel the need to email an administrator directly to obtain a more immediate response. When I did not complete a PS-74 form in response to student harassment, it was often because I did not know the student's name. I made attempts to have the administration look at security footage where I did not know the name of the student that had harassed me,

though I was often told in these situations that the administration had not been able to identify the student in the footage.

52. I filled out and submitted many PS-74 referral forms during my time at Friendly High School to document the abuse and harassment I experienced from students. It is my understanding that teachers are supposed to receive a copy of the referral form back from the administration after an incident is investigated, with a notation reflecting the result of the investigation and any discipline that had been imposed. But I never received any PS-74 forms back following the conclusion of an investigation despite asking for such forms in multiple instances. Though I sometimes personally followed up with Mr. Adams regarding actions taken by the administration in response to student misconduct, Mr. Adams typically told me only that he had handled the situation and that the outcome was private. I felt that I should have been informed regarding what discipline had been given in response to the harassment that I faced from students so that I could know what to expect from the administration going forward, but I was given no such information.

53. While I submitted PS-74 forms to address various forms of student misbehavior, most of the PS-74 forms I submitted were due to harassment that I faced due to my gender identity. For example, I would complete PS-74 forms in instances where I had been subject to aggressive misgendering, slurs, or other forms of harassment from students based on my gender identity.

54. The administration at Friendly High School in some instances discouraged me from filing a PS-74 form. For example, after I was physically assaulted by a student in the 2011-2012 school year, Mr. Adams discouraged me from filing a PS-74 form, stating that “any students who may like you right now won’t like you if you file this.”

55. During the 2014-2015 academic school year, Ms. Robinson was primarily responsible for responding to the incidents raised in the PS-74 forms that I submitted. However, I never received any indication that Ms. Robinson took any action to remedy the harassment that I reported in my PS-74 forms, though I filed numerous PS-74 forms with Ms. Robinson.

56. While I kept copies in my classroom of the PS-74 forms that I submitted and brought these files to each new school at which I taught, I did not receive these PS-74 forms back from James Madison Middle School after I went on FMLA leave in October 2016. Regardless, these copies would have only shown my reporting of an incident and would not have shown the results of any investigation or the discipline imposed because I never received copies of completed forms containing that information.

#### **PGCPS Discrimination or Harassment Incident Report**

57. On February 20, 2015, I filed a Discrimination or Harassment Incident Report with PGCPS due to repeated misgendering by Ms. Robinson, an English Department Administrator and Assistant Principal at Friendly High School.

58. In that report, I detailed the difficulties that Ms. Robinson and I had during our one-and-a-half years working together. Ms. Robinson had previously referred to me as “sir,” “mister,” and as “he” when talking to others. After I confronted Ms. Robinson about her misgendering, she told me to be patient because she was having trouble “adjusting,” despite the fact that Ms. Robinson had only ever interacted with me as female, because I had already socially transitioned. I believe that Ms. Robinson’s behavior indicated a clear bias against transgender individuals, especially trans women. After Ms. Robinson repeatedly misgendered me during a February 13, 2015 technology training, I filed the Discrimination or Harassment Incident Report.

59. I requested: (a) a formal written apology from Ms. Robinson; (b) that Ms. Robinson no longer be my administrative supervisor and that she no longer conduct observations of my classroom; (c) that the school conduct a trans awareness and sensitivity training for staff and faculty; and (d) that I have approval over the content of such a training.

60. However, PGCPs issued a Letter of Determination on June 25, 2015 stating that it was unable to conclude that I had been subjected to discrimination and/or harassment violative of Administrative Procedure 4170. Although PGCPs acknowledged that it had substantiated the misgendering against me, PGCPs stated that the misgendering “appear[ed] to have been done in error and without malice.” PGCPs also acknowledged that Ms. Robinson routinely communicates with her subordinates in a manner that is rude, condescending and disrespectful and has been previously disciplined for making racially insensitive remarks. PGCPs recommended that Ms. Robinson receive appropriate professional counsel and/or discipline as deemed appropriate and that during the 2015-2016 academic year, both Friendly High School students and staff receive diversity and sensitivity training. However, to my knowledge, no such training ever took place.

### **EEOC Charge of Discrimination**

61. Due to the continued harassment I faced from students, parents, and faculty based on my gender identity and lack of action from the school administration after being on clear notice of such harassment, I filed a Charge of Discrimination with the EEOC. My notarized complaint alleging violation of Title VII on the basis of sex was dated June 3, 2015, and I provided notice to PGCPs of the complaint on June 4, 2015. In my complaint, I detailed the repeated incidents of discrimination and harassment that I faced because of my sex and transgender status in the form of transphobia and trans-misogyny by students, parents, faculty, and administrators. A July 7, 2015 letter to the EEOC also noted that following the filing of my

grievance, administrators and officials at Friendly High School, including Mr. Adams, took action to remove me from teaching AP English classes despite having not previously raised any issues about my performance or providing notice of any performance issues, as discussed further below.

62. I filed an amendment to my EEOC Charge of Discrimination on April 29, 2016 detailing additional acts of retaliation by administrators and officials at Friendly High School and acts of harassment directed towards me.

### **Harassment at James Madison Middle School**

63. Due to the continued harassment and retaliation I faced at Friendly High School, I sought a transfer to James Madison Middle School. Though PGCPSS was not cooperative in facilitating my transfer, I was eventually able to secure a transfer and started teaching at James Madison Middle School in fall 2016.

64. However, the work environment at James Madison Middle School quickly became hostile in September 2016. Students constantly misgendered me and became increasingly aggressive in their interactions towards me. For example:

- a) On September 2, 2016, a student misgendered me, shouting to others as I was passed by, "Here he comes! Look out HE'S coming!"
- b) On September 13, 2016, while picking up my class from the cafeteria after lunch, a student from another class shouted, at full volume, "It's a man! It's really a man!"
- c) On September 27, 2016, after dropping off my class at the cafeteria for lunch, a student screamed "MISTER Eller" at me.
- d) On September 28, 2016, a student referred to me as "sir."
- e) Students screamed in the hallway, "Here it comes, here comes that Mr. Eller."

- f) At one point, a student threatened to burn my house down, telling me that I was not really a person and so it did not matter if he hurt me, actions that I perceived to be based on my transgender status. This same student had misgendered me on a number of occasions in September and October.
- g) On October 4, 2016, I asked the class for an example of the use of the word “sham.” One student respondent, “Caitlyn Jennings [a reference to Caitlyn Jenner, a transgender woman] body is a sham.” The classroom then erupted in laughter.
- h) On October 5, 2016, as I was walking to my car, someone screamed across the parking lot at me, “Mister Eller!” The individual screamed this with increasing intensity four times. The experience was frightening and triggering.
- i) On October 6, 2016, a student who had continuously and aggressively misgendered me told me that he could take out his anger on me if he wanted to do so.

65. The constant harassment I faced at James Madison caused interference with my focus at work, and I started to feel overwhelmed.

**Lack of Response from Defendants While I Taught at James Madison Middle School**

66. I reported all of these incidents to James Madison administration, including through a formal PS-74 report in at least one instance. As far as I was told, the only response was that Mr. Connelin, an assistant principal, and/or Ms. King, the principal, told these students that their behavior was inappropriate.

67. I saw no diversity training measures in place at James Madison Middle School other than the standard PGCPS training module for faculty and staff that consisted of reiterating the statement that PGCPS does not discriminate on the basis of characteristics including sex,

race, and sexual orientation. Notably, this statement did not contain any language prohibiting discrimination on the basis of gender identity.

68. I made efforts, as I did at my previous schools, to implement diversity training that would address harassment and discrimination on the basis of gender identity. I spoke directly to Mr. Connelin and Ms. King regarding the implementation of diversity training at James Madison Middle School. Mr. Connelin was not receptive to the idea of additional diversity training. I discussed with Ms. King the possibility of holding a general diversity training within James Madison Middle School for the students due to the intolerant climate I had witnessed at the school among students, including but not limited to attitudes about transgender individuals. I told Ms. King that I could get her recommendations for resources for any potential training, and Ms. King stated that she wanted to speak with her supervisor first. Ms. King agreed in principle that it would make sense to implement diversity training, but she later informed me that the administration prevented any such training from occurring during the time before I had to take a leave of absence.

69. I attempted to talk to Mr. Connelin about misgendering incidents and harassment that were starting to happen at the school, but his response was that I should grow a thicker skin and should stop “proselytizing” the students. He stated that I should not advocate for any LGBTQ issues on campus and that I should ignore any teachers or staff who expressed disapproval of transgender people.

#### **Retaliation by PGCPs Administrators and Officials**

70. I experienced acts of retaliation by PGCPs both before and after the filing of my Discrimination or Harassment Incident Report and EEOC Charge of Discrimination. During the 2013-2014 school year, Mr. Adams became even less responsive to the issues I was raising regarding discrimination and harassment on the basis of my gender identity and also removed me

from a classroom that was near the primary office that had allowed me to easily access an administrator if there were any problems. My new classroom was smaller, in the far back end of the school, and in an area that was less visible from which I could not easily obtain administrative help. It was also more difficult to check security cameras at the location of my new classroom.

71. When I asked Mr. Adams about the classroom change, he responded that sometimes he just does these things. However, I suspected that the classroom change was retaliation for my continued complaints about the harassment that I too frequently experienced and my attempts to obtain diversity training. After my classroom was moved, the security personnel and administration at Friendly High School became increasingly non-responsive to my calls over the intercom directly to the office for help when there were significant disciplinary issues in or near my classroom. Sometimes no one would answer the intercom, and sometimes after someone answered, no security personnel would come to my classroom.

72. On June 8, 2015, just four days after notifying PGCPS that I had filed a Charge of Discrimination with the EEOC, my own students informed me that I was being removed from teaching AP English. When I asked Mr. Adams about my removal from teaching AP English that day, he stated that it was being considered but that no decision had been made.

73. On June 11, 2015, Mr. Adams called me into his office to inform me that I would no longer be teaching AP English. Mr. Adams insinuated that my students' test scores were low, which was the opposite of what he had told me at the beginning of the school year, argued that my class was not difficult enough, and stated that I did not do enough in my teaching. He also presented me with a letter from a student who had received disciplinary action in my class that made false accusations against me, including that I threatened to give the student a zero for the

whole year, that I failed to teach the material, that I wasted class time with personal stories, and that I discussed my sexuality in class. None of these allegations were true. Mr. Adams then stated that I was too popular with the students and that their education was suffering as a result.

74. I suspected that my removal from my position as an AP English teacher was a retaliatory act by Mr. Adams, given that he had repeatedly told me that my AP students were my “best allies.” I had consistently received positive evaluations at Friendly High School up until this time, including in the AP English classes that I taught, and Mr. Adams had even asked me to be the chair of the English Department for the 2013-2014 academic school year.

75. Another administrator, Mr. Thompson, contradicted the reasons Mr. Adams gave for removing me from my position as an AP English teacher. Mr. Thompson stated, after Mr. Adams stepped out of the office, that the removal was not about my teaching and that I was a good teacher. Mr. Thompson stated they just wanted to give everyone else an opportunity to teach these classes.

76. On June 22, 2015, Dr. Simmons, the English Department Chair, informed me that the AP English classes were being taken away from me because parents were complaining about my “lifestyle” being inappropriate and, although Mr. Adams was not saying anything in support of the parents, neither was he defending me as a teacher.

77. My removal from teaching AP classes had a detrimental effect on my work environment because the students in those classes had generally been the ones to be most accepting of me, or at least less likely to make derogatory remarks in my presence or misgender me. In fact, Mr. Adams and other school administrators had often remarked that these students were my greatest supporters at the school. So, when Mr. Adams removed me from teaching those classes, I feared that when I returned to Friendly to teach in the 2015-16 school year, I

would be exposed to a greater number of students who might be hostile to me because of my gender identity. And, that was indeed the case; the classes I taught in the 2015-16 school year were more hostile than any others I had taught, resulting in an increasingly untenable environment that caused me to request a transfer to another school and, eventually, forced my leave of absence and resignation.

78. In October 2015, I was further retaliated against for raising concerns about Ms. Claggett, a teacher who had repeatedly misgendered a trans male student, an incident I mention above. On October 26, 2015, I had a discussion with Ms. Claggett about her misgendering of the student, and Ms. Claggett stated during the course of that conversation that it would violate her conscience to refer to the student as male and that she would not “push the Transgender Agenda.” After informing Mr. Adams of this incident, Mr. Adams requested that I send him an account of the interaction, which I did. Three days later, on October 29, 2015, I received a Letter of Counsel from Mr. Adams stating that my actions were inappropriate by confronting another employee regarding a student’s personal concerns instead of confiding in an administrator. The Letter of Counsel stated that it served as a warning and that if there were any future concerns in reference to inappropriate actions from me towards another employee, it could result in additional disciplinary action, which could include formal documentation.

79. In the fall of 2015, I also received a Letter of Counsel for raising my voice at Mr. Adams during a meeting in the library regarding the right of the union to hold a private vote and Mr. Adams’ presence during that vote. I raised my voice at Mr. Adams because he was being exceptionally rude to Julia Gaffney, a teacher liaison to the union and one of the teachers in the Friendly High School social studies department. Mr. Adams was talking over Ms. Gaffney, cutting her off when she tried to speak, and not allowing her to say anything at all. After

watching this exchange for several minutes, I became frustrated with Mr. Adams' treatment of Ms. Gaffney and felt the need to interject. Mr. Adams was not following the guiding principles of the meetings as printed on our meeting agendas, which is that all voices will be heard and all people listened to respectfully.

80. After my filing of the EEOC Charge of Discrimination, members of the administration and staff began raising exaggerated accusations against me that were at odds with my actual behavior and demonstrated character during my tenure at Friendly High School. These allegations eventually resulted in two disciplinary hearings in April of 2016, during which Mr. Adams accused me of, among other things, having thrown a pen at a student, failing to properly teach my classes, shouting at students, and causing students to fear for their safety. The disciplinary committee did not sanction me.

81. Although these forms of retaliation were the most overt, I also experienced retaliation through the lack of response by school and central-office administrators to my reports of harassment. In the time just after I underwent my social transition at work, these supervisors promised to look into possible training related to transgender nondiscrimination and related issues of diversity, and appeared receptive to suggestions and alarmed at my reports of discrimination. But as the years went by, administrators responded less frequently to my reports of discrimination. This became especially pronounced after I filed my internal complaint against Ms. Robinson and my EEOC Charge. For example, when I started at Friendly, Mr. Adams at first would listen to my requests for diversity training and say he would consider the issue. But he became less and less interested in hearing me make a case for that training as the years went on—all the while, no new training was implemented at Friendly High School. He also stopped responding to my reports about the specific instances of discriminatory harassment against me,

not engaging with me on possible remedies but instead delegating investigation of these incidents to security personnel. And when I elevated my concerns of discrimination to Mr. Fossett, Mr. Adams's supervisor, in the fall of 2015, he never responded to multiple emails. This demonstrated lack of concern for ongoing harassment or for my wellbeing was extremely distressing and instilled in me a sense of hopelessness that nothing would improve at PGCPs for transgender faculty like myself.

### **Forced Resignation**

82. After years of harassment and a willful lack of response by any of the schools at which I had taught, I reached my breaking point in October 2016. At this point I had suffered through years of harassment and indifference at Friendly High School. Upon reaching James Madison, I was hopeful for a better environment, and indeed Ms. King did at least seem more supportive than Mr. Adams. But after again facing repeated demeaning and hurtful remarks about my transgender status from students there, and seeing the same anemic response by administrators and a complete unwillingness by PGCPs to undertake any proactive training that could prevent or diminish future harassment, I hit a point of severe emotional distress. Finally, I found myself unable to teach one day, having to rely on my co-teacher while I sat at my desk feeling profoundly sad and vulnerable, and unable to engage socially with others. I knew then that I could not mentally deal with the stress of returning to this kind of work environment day after day. In order to protect my health, I was forced to take a leave of absence on October 18, 2016.

83. Soon after taking my leave of absence, I checked into an outpatient psychiatric program at Georgetown University Hospital, where I was diagnosed with post-traumatic stress disorder ("PTSD") from the abuse, discrimination, and retaliation I experienced as an employee of Defendants. My depression and anxiety spiked at the time I was admitted to Georgetown

University Hospital, and I had been given the clinical opinion that due to my worsening depression and anxiety, it was necessary for me to take an extended leave of absence from work.

84. I was in the outpatient psychiatric program at Georgetown University Hospital from November 2, 2016 through December 16, 2016. However, on or around November 9, 2016, I had to return to PGCPs to complete paperwork related to my leave, and I heard students in the hallway stating, "There is the man in the dress."

85. While at Georgetown University Hospital, I sought recovery from the trauma inflicted by the PGCPs system. During this time, I was often highly stressed about my employment situation and my treatment by students and staff at PGCPs, and I experienced symptoms including repeated nightmares, fatigue, lack of sleep, nausea, dizziness, swelling of my feet and legs, and dehydration. I felt very broken during this time, as if something inside me was shut off, perhaps permanently. I was emotionally distant and could become mentally absent when triggered by stress. I was afraid that I would not be able to function going forward, and I was unable to relate to the people around me.

86. During my time in the outpatient program, I primarily interacted with a nurse who was my main point of contact, but I avoided social interaction with others. Indeed, I was so afraid that any interaction would be hurtful, that I could not bring myself to interact with anyone other than my nurse and my partner. I had reached the point where I had to re-learn basic tasks because I felt I could not do things for myself.

87. While I was in the Georgetown University Hospital outpatient psychiatric program, I spent all my time either at my home or in the program itself. During this period of time, I felt as if I was shut off and was reliant on my partner, Sara. When I was at home away from the program, I avoided social interaction with others and interacted only with my partner

and one neighbor within my apartment complex. At home, just as at Georgetown University Hospital, I was mentally absent. Whereas I used to engage in frequent social conversation with my neighbor, I was unable to engage with my neighbor during the period that I was in the outpatient psychiatric program. My neighbor would sometimes invite me over and just let a movie play just so that I could have some form of social interaction, even though we did not speak.

88. Following my outpatient treatment, I remained in a fragile condition, requiring therapy sessions. Through the course of my leave, I realized that, without any changes to the structural system, PGCPS would never be an environment where I could work. Though I had previously attempted through the years to work with PGCPS to adopt changes to prevent discrimination and harassment, PGCPS repeatedly shut me down and shut me out. I discussed the possibility of returning to teaching with my therapist and partner, but the thought of returning to the classroom put me in a bad mental state, and I knew there was no way that I could both return to teaching at PGCPS given the hostile environment that permeated its schools and protect my mental health. I was worried that the harassment would be even more severe the next time around and that I would not be able to recover. My experiences at PGCPS stripped the joy of teaching away from me.

89. After concluding that I would not survive the strain of returning to my prior intolerable working conditions, I was forced to resign on August 18, 2017.

#### **Emotional Harm Inflicted by Harassment and Discrimination**

90. The discriminatory conditions and retaliatory actions of my work environment caused me substantial pain and suffering. To treat the emotional trauma that I suffered, I had to attend psychiatric counseling and outpatient psychiatric hospitalization for PTSD, depression, and anxiety, incurring significant costs in doing so. I also incurred significant expenses related

to physical ailments, including chronic back pain and weight gain, both of which were caused or exacerbated by the stress of the hostile work environment and retaliation.

91. I continue to seek treatment today for my PTSD that the hostile work environment I experienced at PGCPs caused. My treatment includes weekly participation in dialectical behavioral therapy and talk therapy sessions. While my PTSD has improved, I continue to experience PTSD, depression, and anxiety due to the harassment and discrimination I faced at PGCPs.

### **Financial Harm Inflicted by Harassment and Discrimination**

92. After being forced to take a leave of absence and resign, I took a part-time job at Target in order to support myself. I worked at Target from February 10, 2017 through August 2018 as a cashier. When I started working at Target, I informed Target that I was on a leave of absence from my teaching job at PGCPs. I made approximately \$9.70 per hour when I started at Target and was making about \$11.47 per hour upon leaving, only a fraction of my prior salary as a teacher. I did not have any fringe benefits at Target.

93. I eventually secured employment in March 2017 at the United States Navy's Child & Youth Programs (the "Navy CYP"), where I initially worked as a Program Assistant doing tutoring and recreational activities for children ages 5 through 18. That position was not full-time, had no fringe benefits, and the hours were not guaranteed. I received two pay increases in my role as a Program Assistant. My salary was initially \$11.23 per hour at the start of the role in March 2017 and increased to \$15 per hour around December 2018. My salary then increased to \$17.84 per hour in Spring 2019. On March 27, 2020, I was promoted to the position of Program Lead, which is a full-time position that provides benefits. My new role as Program Lead is similar to my role as Program Assistant but includes additional managerial responsibilities. My current annual salary in my new position as Program Lead is \$44,661.60.

My promotions and salary increases were performance-based. Nevertheless, my income is still less than my salary at PGCPS. I am treated with respect and as an equal at the Navy CYP.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 4/26/2021.

DocuSigned by:  
*JENNIFER ELLER*  
84B3C6E6C51B408...

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Jennifer Eller

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

JENNIFER ELLER

Plaintiff,

v.

PRINCE GEORGE'S COUNTY PUBLIC  
SCHOOLS, PRINCE GEORGE'S COUNTY  
BOARD OF EDUCATION, and MONICA  
GOLDSOIN in her official capacity

Defendants.

Case Number: 18-cv-03649-TDC/TJS

**EXHIBIT 16**



Maha Fadli &lt;mfadli@pgcps.org&gt;

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**Excessive Harassment**

5 messages

Tue, May 17, 2011 at 4:13 PM

To: Maha Fadli &lt;mfadli@pgcps.org&gt;, James Whattam &lt;james.whattam@pgcps.org&gt;, Nguherij@pgcea.org

When I started this process I realized that there would be backlash from students and that I would be called fag, gay, homo, tranny. Though this type of behavior is unacceptable I have taken it with a measure of humility and compassion. Now, however, there is a group of students calling me "Booty Warrior" and when I asked a class what that meant they directed me to this site: <http://www.youtube.com/watch?v=by7PW71Ovdl> Specifically, the first minute and twenty seconds. "Booty Warrior" is a reference to pedophilia and a specific child molester. This is takes things too far and I respectfully request that educational action be taken. The other slurs I allow to roll off my back but I will not stand to be called a pedophile.

Ms. Eller

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**Maha Fadli** <mfadli@pgcps.org>

Tue, May 17, 2011 at 9:56 PM

To: bernardette woodbury &lt;bernardette.woodbury@pgcps.org&gt;

[Quoted text hidden]

Maha Fadli  
Kenmoor Middle School Principal  
Tel 301 925-2300  
Fax 301 925-2317

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**Maha Fadli** <mfadli@pgcps.org>

Tue, May 17, 2011 at 10:20 PM

To: Andrew Zuckerman &lt;andrew.zuckerman@pgcps.org&gt;

What am I to do about this? eller has decided to tell all his kids about himself. Helpppppp!!!!

----- Forwarded message -----

From: [REDACTED]  
Date: Tue, May 17, 2011 at 4:13 PM  
Subject: Excessive Harassment  
To: Maha Fadli <mfadli@pgcps.org>, James Whattam <james.whattam@pgcps.org>, Nguherij@pgcea.org

When I started this process I realized that there would be backlash from students and that I would be called fag, gay, homo, tranny. Though this type of behavior is unacceptable I have taken it with a measure of humility and compassion. Now, however, there is a group of students calling me "Booty Warrior" and when I asked a class what that meant they directed me to this site: <http://www.youtube.com/watch?v=by7PW71Ovdl> Specifically, the first minute and twenty seconds. "Booty Warrior" is a reference to pedophilia and a specific child molester. This is takes things too far and I respectfully request that educational action be taken. The other slurs I allow to roll off my back but I will not stand to be called a pedophile.

Ms. Eller

[Quoted text hidden]

---

**Andrew Zuckerman** <andrew.zuckerman@pgcps.org>

Wed, May 18, 2011 at 8:02 AM

To: Maha Fadli <mfadli@pgcps.org>

Will call you today...

Sent from my iPad

[Quoted text hidden]

---

**Nguherimo, Jephta** <Nguherij@pgcea.org>

Thu, May 19, 2011 at 2:44 PM

To: James Whattam <james.whattam@pgcps.org>

Cc: "Robinson, Lewis" <robinsoi@pgcea.org>, Maha Fadli <mfadli@pgcps.org>, Andrew Zuckerman <andrew.zuckerman@pgcps.org>

Jim,

I see Mr. Eller forwarded this to you. what measures has been taken. Please advise.

**Jephta Nguherimo**

*UniServ Director*

Prince George's County Educators' Association

t 301.736.2700

f 301.568.8900

[Quoted text hidden]

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

JENNIFER ELLER

Plaintiff,

v.

PRINCE GEORGE'S COUNTY PUBLIC  
SCHOOLS, PRINCE GEORGE'S COUNTY  
BOARD OF EDUCATION, and MONICA  
GOLDSOIN in her official capacity

Defendants.

Case Number: 18-cv-03649-TDC/TJS

**EXHIBIT 17**



Jennifer Eller <jennifer.eller@pgcps.org>

---

## Diversity/Sensitivity Assembly

1 message

---

Jennifer Eller <jennifer.eller@pgcps.org>

Mon, Aug 13, 2012 at 4:32 PM

To: Raynah Adams <rayadams@pgcps.org>

Bcc: [REDACTED]

Mr. Adams,

At the end of the 2011-2012 school year we discussed things that would reduce stress and friction for me in the coming school year. At the time, I mentioned how a general discussion on diversity in the school environment that address gender, sexual, and other types of diversity and address appropriate and inappropriate responses to said diversity would create a more stable educational environment.

The need for such an assembly is strong. I have had students (both mine and not mine) consistently and purposefully refer to me by the wrong pronouns despite repeated corrections, I have been asked inappropriate and personally invasive questions by students ('do you have a dick,' 'do you bleed,' and 'have you cut it off' being the most common and vulgar), and I have been referred to by offensive and bigoted names both directly and indirectly (tranny, he-she, chick-with-dick, shemale, it).

I believe a mandatory diversity/sensitivity assembly would reduce the number and frequency of these events and help prepare the students for life in the diverse world outside Friendly's walls. Further, it is my understanding that the teachers' union can help provide speakers for such assemblies either from their own offices or affiliated groups.

Ms. Eller



Jennifer Eller &lt;jennifer.eller@pgcps.org&gt;

---

**Diversity Training Follow-Up**

4 messages

**Jennifer Eller** <jennifer.eller@pgcps.org>

Tue, Aug 21, 2012 at 12:55 PM

To: Raynah Adams &lt;rayadams@pgcps.org&gt;

Bcc: [REDACTED] Julia Gafney &lt;julia.gafney@pgcps.org&gt;

Mr. Adams,

I wanted to follow-up with you and see where we were at in arranging a diversity/sensitivity assembly for the kids. A few incidents on Monday, August 20 confirmed the need for the training to me. Including being mister-ed a dozen times by my students and having a hall-walker enter my room during third period and say, "What the hell are you wearing?" I needed to tell the boy to go to his class three times before he left.

Ms. Eller

---

**Raynah Adams** <rayadams@pgcps.org>

Tue, Aug 21, 2012 at 1:00 PM

To: Jennifer Eller &lt;jennifer.eller@pgcps.org&gt;

We are going to address in the assemblies and over the P.A.

[Quoted text hidden]

--

Raynah H. Adams, IV  
Principal  
Friendly High School

---

**Jennifer Eller** <jennifer.eller@pgcps.org>

Tue, Aug 21, 2012 at 1:01 PM

To: Raynah Adams &lt;rayadams@pgcps.org&gt;

Thank you.

[Quoted text hidden]

---

**Raynah Adams** <rayadams@pgcps.org>

Tue, Aug 21, 2012 at 1:01 PM

To: Jennifer Eller &lt;jennifer.eller@pgcps.org&gt;

Not a problem.

[Quoted text hidden]



Jennifer Eller <jennifer.eller@pgcps.org>

---

## AP Curriculum/Pacing Guide

1 message

---

**Jennifer Eller** <jennifer.eller@pgcps.org>  
To: Raynah Adams <rayadams@pgcps.org>

Fri, Aug 24, 2012 at 8:22 AM

Mr. Adams,

Could you, please, send me the name of who I should contact for the AP curriculum and pacing guide.

Ms. Eller



Jennifer Eller <jennifer.eller@pgcps.org>

---

## PS-74's from Friday, August 24

2 messages

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Jennifer Eller <jennifer.eller@pgcps.org>

Mon, Aug 27, 2012 at 1:47 PM

To: Latanya Catron <latanya.catron@pgcps.org>, Raynah Adams <rayadams@pgcps.org>

I wanted you to know that I have made contact with E P father and discussed E behaviour in class with him. He told me he would talk with E to help improve his attitude in the classroom. Contact was made at 2:30 pm on Friday, August 24.

As for A K we talked after class about his lack of focus and have come up with a mutually agreed on course of action. He will receive a seat near the front. His parents were not called this time, but he knows a second occurrence will result in a parental involvement.

Ms. Eller

---

Latanya Catron <latanya.catron@pgcps.org>

Mon, Aug 27, 2012 at 1:58 PM

To: Jennifer Eller <jennifer.eller@pgcps.org>

Thank you for trying to work it out with the students.

[Quoted text hidden]

--

Dr. LaTanya Catron-Feazell  
Assistant Principal  
Friendly High School  
10000 Allentown Road  
Fort Washington, MD 20744  
(301)449-4900

**"To achieve all that is possible, we must attempt the impossible. To be as much as we can be, we must dream of being more." - Karen Ravn**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

JENNIFER ELLER

Plaintiff,

v.

PRINCE GEORGE'S COUNTY PUBLIC  
SCHOOLS, PRINCE GEORGE'S COUNTY  
BOARD OF EDUCATION, and MONICA  
GOLDSOIN in her official capacity

Defendants.

Case Number: 18-cv-03649-TDC/TJS

**EXHIBIT 18**

To: bbeallor@pgcca.org[bbeallor@pgcca.org]

From: [REDACTED]

Sent: Mon 11/18/2013 10:12:52 AM Eastern Standard Time

Subject: Concerns

---

Brian,

The concerns that I have been having are the continued sexual harassment and threats in the hallways. On the 23rd of October I was walking down the hall and a student shouted insults and blatant misgendering from inside her classroom. The staff person in the room just let her do this without correcting her or telling her to behave. I have, also, been physical threatened by students while walking in the halls; the most recent being a student who whispered "you best watch yourself." Along with various inappropriate questions "how much do you charge" and "did you cut it off" being the most common. Most teachers do not correct students or intervene to help me when they see these things occurring and I have to be cautious in regards to which staff I speak with in general as there are those who do not want me here. (I keep to a very small group that I trust and avoid contact with others.)

I have been in contact with my principal about these issues since coming here in 2011. I have spoken to him directly and emailed him. I suggested getting a group from GLADD or GLADD recommended to do a general student assembly speaking about harassment/bullying which could include other forms as well (orientation, presentation, faith, for example). I sent him a list of books and resources that could be added to the library for those wishing to know more, nothing was done with that list. I suggested books and resources for the professional library, as well as, having a speaker at one of the staff meeting to address this type of harassment and what they (the staff and faculty) can do to prevent it or stop it when it is happening. Each year he says that is a task for the associate principals. But nothing happens.

This year I have been speaking with associate principal Pope-Brown and she has expressed interest in doing an assembly-like presentation for students via their social studies classes and has left it to me to find a group who can do this. I'm not sure if there will be any budget or if the group would work for free.

This entire situation is exhausting. I am filled with anxiety when I come to work, it can be difficult to find the strength to come in and face the harassment. I have concerns about my safety, especially keen since one of the students harassing me in the halls ran into trouble with law enforcement for gang recruitment at school. I have started seeing a therapist specifically for these issue, the anxiety it has created, and the traumatic memories it calls to the surface.

I have copies of some of the documents and emails pertaining to this issue. My number 703-565-6468 should you like to talk that way, but please text me with your name and number before calling so I know who is calling (I do not answer to numbers I don't recognise).

Thank you for your help.

Jennifer Eller

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

JENNIFER ELLER

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PRINCE GEORGE'S COUNTY PUBLIC  
SCHOOLS, PRINCE GEORGE'S COUNTY  
BOARD OF EDUCATION, and MONICA  
GOLDSOIN in her official capacity

Defendants.

Case Number: 18-cv-03649-TDC/TJS

**EXHIBIT 19**

To: Raynah Adams[rayadams@pgcps.org]

Bcc: [REDACTED]

From: Jennifer Eller[jennifer.eller@pgcps.org]

Sent: Tue 8/21/2012 12:55:10 PM Eastern Daylight Time

Subject: Diversity Training Follow-Up

---

Mr. Adams,

I wanted to follow-up with you and see where we were at in arranging a diversity/sensitivity assembly for the kids. A few incidents on Monday, August 20 confirmed the need for the training to me. Including being mister-ed a dozen times by my students and having a hall-walker enter my room during third period and say, "What the hell are you wearing?" I needed to tell the boy to go to his class three times before he left.

Ms. Eller

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

JENNIFER ELLER

Plaintiff,

v.

PRINCE GEORGE'S COUNTY PUBLIC  
SCHOOLS, PRINCE GEORGE'S COUNTY  
BOARD OF EDUCATION, and MONICA  
GOLDSOIN in her official capacity

Defendants.

Case Number: 18-cv-03649-TDC/TJS

**EXHIBIT 20**

**To:** Jennifer Eller [Jennifer Eller <jennifer.eller@pgcps.org>]  
**From:** Kevin Thompson [Kevin Thompson <kevin3.thompson@pgcps.org>]  
**Sent:** Fri 3/20/2015 1:59:52 PM (UTC-04:00)  
**Subject:** Re: Regarding harassment on the 16 March

Case 1:18-cv-05049-DC Document 107-9 Filed 06/09/21 Page 2 of 2

Hey Ms. Eller,

At this point, according to the Student Handbook, the students are to receive ISS for discipline. They have already served in ISS. Also, the violation was coded as disrespect and not sexual harassment as defined by the handbook.

Please let me know if you have any questions.

Also, I apologize as I was supposed to have let you know yesterday.

Thanks,

On Fri, Mar 20, 2015 at 1:55 PM, Jennifer Eller <[jennifer.eller@pgcps.org](mailto:jennifer.eller@pgcps.org)> wrote:

Mr. Thompson,

I was just checking in to see how you decided to code the harassment from the 16 March based on what the student code of conduct recommends.

Ms. Eller

--

Kevin Thompson  
Assistant Principal  
Friendly High School  
[kevin3.thompson@pgcps.org](mailto:kevin3.thompson@pgcps.org)  
301.449.4900 ext. 83258

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

JENNIFER ELLER

Plaintiff,

v.

PRINCE GEORGE'S COUNTY PUBLIC  
SCHOOLS, PRINCE GEORGE'S COUNTY  
BOARD OF EDUCATION, and MONICA  
GOLDSOIN in her official capacity

Defendants.

Case Number: 18-cv-03649-TDC/TJS

**SEALED**

**EXHIBIT 21**

**To:** Raynah Adams[Raynah Adams <rayadams@pgcps.org>]; Cosby, Kimberly[ Cosby, Kimberly <kcosby@pgcea.org>]  
**Bcc:** Jenny Eller[jenny.eller@gmail.com]  
**From:** Jennifer Eller[jennifer.eller@pgcps.org]  
**Sent:** Mon 6/22/2015 9:37:29 AM (UTC-04:00)  
**Subject:** Harassment from student in Hall

Case 8:18-cv-03649-DC Document 107-10 Filed 06/09/21 Page 2 of 2

Mr. Adams,

At approximately 9:30 am on Monday, 22 June, 2015, there were three girls walking down the hallway. One of them stopped in front of my open door and waggled her crotch at me while saying in a sing-song voice "Ho!"

Please check the security cameras to ascertain who the student is. I would like to be kept updated on how this infraction is handled.

Ms. Eller

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

JENNIFER ELLER

Plaintiff,

v.

PRINCE GEORGE'S COUNTY PUBLIC  
SCHOOLS, PRINCE GEORGE'S COUNTY  
BOARD OF EDUCATION, and MONICA  
GOLDSOIN in her official capacity

Defendants.

Case Number: 18-cv-03649-TDC/TJS

**EXHIBIT 22**

To: [REDACTED]  
From: [REDACTED]  
Sent: Mon 9/2/2013 2:17:08 PM Eastern Standard Time  
Subject: Re: Thanks for book recommendation and first week

---

Suzi, glad to hear things have been going pretty smoothly for you. With a little grace and luck there won't be any major problems. I hope your daughter is doing well and that the changes have been equally smooth for her.

Serrano's book is very powerful and I'm glad you read it. You seemed reluctant when I mentioned it to you, so I was unsure if you would follow up on the recommendation. The book helped put a lot of things into perspective for me and opened my understanding of who I am. I'm glad you have found it worth your while.

Each year, for me, is a new struggle. The returning students and staff tell the new students and staff all about my past, so despite having more passing privilege with each year, I can never leave my past behind (which is all I want). In fact, the more I pass, the angrier people are when I'm outed to them. I've got four sets of parents who have instructed their kids to skip my class rather than have them in the same room as me; they are filing complaints with the board about my being allowed in the classroom. I'm still fighting with HR to recognise my legal name on email and calendar services, which are visible to the public and has been a major source of continued discrimination and bigotry. This will be my third year waging this battle; I'm starting to think its easier to let people disrespect me than to fight it.

So, that's my year so far, I'm glad to hear yours is going better.

Jenny

On Sep 1, 2013 8:17 AM, "Suzi" <[REDACTED]> wrote:

Hi Jenny,

I want to thank you for a book recommendation you gave me (you probably don't even remember). You suggested I read "Whipping Girl" by Julia Serrano. I really didn't want to read yet another screed by an angry trans woman, but I read the first few page online and it was so amazing, I actually ordered it from B&N. I just finished reading it, and I can't believe how perceptive she is. A lot of the stuff seems so obvious but I've never heard anyone say it before. Anyway, I've been having a bookgasm all week over it.

First week with the students passes as smoothly as I could imagine. Students were all business, not one seemed to bat an eyelash at my transition. I did have a student make fun of my voice in my homeroom (students I don't see often, so I won't be forming a personal relationship with them.) I gave him a pep talk on how it doesn't pay to get on someone's bad side because you never know who you're going to need a favor from.

No blowback from parents, either, though our back to school night isn't until tuesday, so we'll see what happens then.

How are things going for you this year?

Suzi G

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

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Plaintiff,

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BOARD OF EDUCATION, and MONICA  
GOLDSOIN in her official capacity

Defendants.

Case Number: 18-cv-03649-TDC/TJS

**EXHIBIT 23**

To: Julia Gafney[julia.gafney@pgcps.org]; Cosby, Kimberly[keosby@pgcea.org]; Mahalia Jackson[mahalia.jackson@pgcps.org]; Mark Fossett[mark.fossett@pgcps.org]

Bcc: [REDACTED]

From: Jennifer Eller[jennifer.eller@pgcps.org]

Sent: Wed 10/7/2015 9:24:22 AM Eastern Standard Time

Subject: List of Micro-Aggressions From 18 August to 2 October, 2015

---

In the EEOC ruling dated from June of this year, it was determined that Mr. Adams should have conducted a diversity awareness and sensitivity training for both staff and students. As of the writing of this email, this training has not occurred. In the time between the start of school and today, I have experienced the following micro-aggressions and mis-genderings. This list indicates that the work environment is openly hostile toward transgender workers making it a psychologically unsafe environment with the potential of becoming a physically unsafe environment (given the high rate of violence against trans women this second is a reasonable fear). Complicating matters is the arrival a trans man student who is now experiencing routine harassment from other students, making the need for this training more vital.

Given that Mr. Adams and Ms. Elizabeth Davis have been non-responsive when I have raised this issue with them past, and given recent interactions with Mr. Adams, I am afraid of retaliatory actions for complaints issued, I am unsure who to be delivering this to. Please advise.

Ms. Jennifer Eller

**List of Micro-Aggressions and Mis-Genderings From 18 August to 2 October, 2015**

Tuesday, 18 August, 2015 - referred to as "sir" by Ms. Redmond during FIT training session she was leading.

Thursday, 27 August, 2015 - called a "guy in a dress" by two female students walking in the hallway between classes.

Friday, 28 August, 2015 - was greeted as "Mister-- Ms. Eller" by a teacher I did not recognize, while getting my staff mail.

Tuesday, 1 September, 2015 - while leaving the building at end of day, female student runs away as I walk by the area she is in. She is shouting, "Son, why you gotta keep moving this way! You scary ass shit!"

Friday, 4 September, 2015 - Mr. Brooks called me "sir" while talking one-to-one with me at a department meeting. I believe this was a honest slip and not done on purpose.

Friday, 11 September, 2015 - a student with cropped, pink colored hair walked up to me in the hallway between fourth and fifth period and screamed at me in a high pitched wail then walked away.

Tuesday, 22 September, 2015 - a student, as I was walking into the school, in the morning, said in reference to me, "Ew, it thinks it's a girl. It's wearing a skirt."

Wednesday, 23 September, 2015 - as I was walking in to school, a male student talking to a female student said, "Look at the tranny." In the hallway between third and fourth period a female student said, as she passed me, "Nasty freak."

Monday, 28 September, 2015 - five minutes into third period, as I was waiting for the elevator, two girls wandering the hall were discussing me in a loud voice. The one with bleached hair said to the other, "THAT is a HE/SHE." I instructed them to get to class, but they ignored that instruction.

Wednesday, 30 September, 2015 - Between A and B lunch in the hallway, a male student said to others he was standing with, "Here comes freaky, don't let it look at you." He ducked and hid behind his friends as I walked past.

Friday, 2 October, 2015 - Herman James, co-leader of the professional development at Northwestern High School, referred to me as "sir" despite obvious indication I am female.

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

JENNIFER ELLER

Plaintiff,

v.

PRINCE GEORGE'S COUNTY PUBLIC  
SCHOOLS, PRINCE GEORGE'S COUNTY  
BOARD OF EDUCATION, and MONICA  
GOLDSOIN in her official capacity

Defendants.

Case Number: 18-cv-03649-TDC/TJS

**EXHIBIT 24**



# Queering Caitlin

*You and me, time and space. You watch us run.*

---

9th January  
2012

## Quick Update



Today was difficult to get through. Having an electrolysis appointment on a school day—even a free one—just is not worth the side glances and double-takes the minimum required growth attracts. To top it off, I missed the appointment because I was stuck at school dealing with the ps74 paperwork on a kid who stood in my doorway shouting “tranny” and “transvestite,” as I was lecturing on the argument between Achilles and Agamemnon.

::sighs::

I'm glad it is over. Time for bed before the start of another one.

Tweet Facebook Email ShareThis

[Permalink](#)

---



## About the author

Formerly: i-am-river | Writer, Essayist, Poet (in collection: When We Become Weavers) | Woman, Femme, Queer, Trans | Trans Feminist, Intersectional Feminist | Fangirl: Hourou Musuko (Wandering Son), Sailor Moon, Supergirl, Wonder Woman, Rose of Versailles, Revolutionary Girl Utena, Voltron Legendary Defender, Sense8, Princess Tutu | Kara Danvers, Delenn, Major Kira Nerys, Captain Kathryn Janeway, Alysia Yeoh, Nomi Marks, Makoto Kino, Haruka Tenou, Katie 'Pidge' Holt, Stevonnie

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*Jennifer Theme by Chloe Briggs.  
For help and support please visit the official theme page.*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

JENNIFER ELLER

Plaintiff,

v.

PRINCE GEORGE'S COUNTY PUBLIC  
SCHOOLS, PRINCE GEORGE'S COUNTY  
BOARD OF EDUCATION, and MONICA  
GOLDSOIN in her official capacity

Defendants.

Case Number: 18-cv-03649-TDC/TJS

**EXHIBIT 25**



Jennifer Eller <jennifer.eller@pgcps.org>

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## Student Concerns

1 message

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Jennifer Eller <jennifer.eller@pgcps.org>

Tue, Aug 30, 2011 at 10:23 AM

To: Raynah Adams <rayadams@pgcps.org>

Mr. Adams,

These are the students from my 1A class that have demonstrated attitude:

G [redacted] S [redacted]  
T [redacted] R [redacted]  
B [redacted] Y [redacted]

At approximately 9:17 two female students were hedging coming around the corner from the main hallway because they had to "go by the he/she."

I am not sure at this point, what can be done. But I am very considered about student and parent reaction, particularly on a "religious" basis.

Thank you.

Ms. Eller



**UNITED STATES DISTRICT COURT  
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Plaintiff,

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BOARD OF EDUCATION, and MONICA  
GOLDSOIN in her official capacity

Defendants.

Case Number: 18-cv-03649-TDC/TJS

**EXHIBIT 26**

**To:** Kevin Thompson[Kevin Thompson <kevin3.thompson@pgcps.org>]  
**Bcc:** [REDACTED] [Case 8:18-cv-03649-TDC Document 107-15 Filed 06/09/21 Page 2 of 2](#)  
**From:** Jennifer Eller[jennifer.eller@pgcps.org]  
**Sent:** Fri 5/13/2016 12:30:50 PM (UTC-04:00)  
**Subject:** URGENT: Please Send Someone to Mr.Brown's Room

I am being referred to as a he-she and there is a student who is constantly trying to get into the room. I do not know where the call button is.

Ms. Eller

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

JENNIFER ELLER

Plaintiff,

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SCHOOLS, PRINCE GEORGE'S COUNTY  
BOARD OF EDUCATION, and MONICA  
GOLDSOIN in her official capacity

Defendants.

Case Number: 18-cv-03649-TDC/TJS

**EXHIBIT 27**

**To:** Ronald Connelin[Ronald Connelin <ronald.connelin@pgcps.org>]  
**From:** Jennifer Eller[jennifer.eller@pgcps.org]  
**Sent:** Thur 9/8/2016 9:49:27 AM (UTC-04:00)  
**Subject:** Re: [REDACTED]

Case 8:16-cv-00849-JDC Document 107-16 Filed 06/09/21 Page 2 of 3

Thank you both for your help. It is greatly appreciated.

On Wed, Sep 7, 2016 at 5:34 PM, Ronald Connelin <[ronald.connelin@pgcps.org](mailto:ronald.connelin@pgcps.org)> wrote:

There was a conversation with [REDACTED] and [REDACTED] and [REDACTED] and myself. We discussed the comment made and gave a very stern warning. I believe Mrs. King contacted the parents and informed them of the situation as well. If he makes any derogatory comment directed towards you. He will be dealt with further. Please keep me informed. Thanks!

On Wed, Sep 7, 2016 at 9:18 AM, Jennifer Eller <[jennifer.eller@pgcps.org](mailto:jennifer.eller@pgcps.org)> wrote:

Can you let me know how it was handled and how he responded? Please and thank you.

Ms. Eller

On Tue, Sep 6, 2016 at 8:14 AM, Ronald Connelin <[ronald.connelin@pgcps.org](mailto:ronald.connelin@pgcps.org)> wrote:

Thanks I will address this matter further.  
Thanks!

On Fri, Sep 2, 2016 at 3:47 PM, Jennifer Eller <[jennifer.eller@pgcps.org](mailto:jennifer.eller@pgcps.org)> wrote:

In module 802 [REDACTED], the young man I sent down to you after lunch, has begun referring to me a "he." When [REDACTED] was playing on the stairwell after lunch and he saw me coming he shouted to the others, "Here he comes! Look out HE'S coming!" I'm not sure how to handle this situation; it feels rather humiliating for me to address this with his parents. Suggestions?

--

Ronald Connelin, Vice Principal  
James Madison Middle School  
*"Home of the Mighty Cougars"*  
7300 Woodyard Road  
Upper Marlboro, MD 20772  
Phone: [301.599.2422](tel:301.599.2422)  
Fax: [301.599.2562](tel:301.599.2562)

--

Ronald Connelin, Vice Principal  
James Madison Middle School  
*"Home of the Mighty Cougars"*  
7300 Woodyard Road  
Upper Marlboro, MD 20772  
Phone: [301.599.2422](tel:301.599.2422)  
Fax: [301.599.2562](tel:301.599.2562)



**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

JENNIFER ELLER

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PRINCE GEORGE'S COUNTY PUBLIC  
SCHOOLS, PRINCE GEORGE'S COUNTY  
BOARD OF EDUCATION, and MONICA  
GOLDSOIN in her official capacity

Defendants.

Case Number: 18-cv-03649-TDC/TJS

**EXHIBIT 28**

**To:** Ronald Connelin[Ronald Connelin <ronald.connelin@pgcps.org>]; Courtney King[Courtney King <courtney2.king@pgcps.org>]  
**From:** Jennifer Eller[jennifer.eller@pgcps.org]  
**Sent:** Wed 9/28/2016 5:30:29 PM (UTC-04:00)  
**Subject:** [REDACTED]

Hello,  
I wanted to inform you that today in class, [REDACTED] referred to me as "sir." She was called out by three students in class for being rude (which I think is positive development), but perhaps you could talk to her.

Ms. Eller

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

JENNIFER ELLER

Plaintiff,

v.

PRINCE GEORGE'S COUNTY PUBLIC  
SCHOOLS, PRINCE GEORGE'S COUNTY  
BOARD OF EDUCATION, and MONICA  
GOLDSOIN in her official capacity

Defendants.

Case Number: 18-cv-03649-TDC/TJS

**EXHIBIT 29**

To: Kimberly Cosby[kcosby@pgoea.org]

From: [REDACTED]

Sent: Thur 2/19/2015 10:55:19 AM Eastern Standard Time

Subject: Ms. Robinson and Misgendering

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I thought for awhile about how I wanted to handle this current situation and have made a decision. I want to put the following incident down on file, and to file a formal complaint against Ms. Robinson.

The incident took place Friday, 13 February, during PD. Ms. Robinson spent nearly an hour referring to me as "him," "sir," and "mister" in front of other staff. Angel Baubadilla was witness to this. Others in the room referred to me as she and I corrected her twice. The first time nothing changed (perhaps she didn't hear me) and the second time I got a five minute "apology" in which she said it was hard for her and I need to be patient with her. She has NEVER known me as anyone other than Ms. Jennifer Eller. She has NEVER seen me before transition. There is no adjustment for her to make. She is instead using the "apology" as an excuse to continue seeing and referencing to me as male. If she does it to me in front of other staff, I have no doubt she does it in front of parents and students.

This behaviour results in three outcomes:

1. She outs my medical history to other people by referring to a legally female employee as male. This is a violation of ADA and the right to self disclosure.
2. She creates an atmosphere of disrespect and abuse. When others see her get away with not respecting me then they feel it is okay for them to do so, also. This creates an atmosphere of hostility and discrimination, which I have to navigate on a daily basis.
3. She is forcing me to function in a psychologically harmful environment of her own creation. I am panicked and scared to go to work because I am afraid of her and how she contributes to an hostile environment loaded with disrespect and harassment.

I have spoken to Mr. Adams directly about these issues in the past and recently had a meeting with him and Ms. Robinson where it was promised that she would not act in discriminatory ways toward me and I agreed to the reinstating of Ms. Robinson as my supervisor. Mr. Adams talks a good game privately but I have not seen him follow through on anything. He always leaves "actions" to grade level administration's discretion and NOTHING CHANGES.

I am at the end of my ability to function efficiently as a teacher in this hostile environment and would like to see legitimate steps taken to resolve this issue and other connected issues (students I don't know asking me about my genitals, Ms. Isom telling struggling students I am transgender, staff and faculty using the wrong pronouns when addressing me, and students wandering the hallways who stop and stare at me while I teach, as though I were a zoo exhibit) all of which Mr. Adams has responded to with phrases like "be the adult in the situation," "write them up," "ignore them," and "be patient." Last year in a meeting attended by Ms. Pope-Brown he went so far as to say he had gay students surveyed and found there was no homophobia or transphobia at our school, which is just short of telling me my experiences with it do not matter or are illegitimate.

Please advise me on the steps I need to take in this process.

Ms. Jennifer Eller

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

JENNIFER ELLER

Plaintiff,

v.

PRINCE GEORGE'S COUNTY PUBLIC  
SCHOOLS, PRINCE GEORGE'S COUNTY  
BOARD OF EDUCATION, and MONICA  
GOLDSOIN in her official capacity

Defendants.

Case Number: 18-cv-03649-TDC/TJS

**EXHIBIT 30**



Jennifer Eller <jennifer.eller@pgcps.org>

G [REDACTED] W [REDACTED], K [REDACTED] S [REDACTED], R [REDACTED] J [REDACTED]  
1 message

Jennifer Eller <jennifer.eller@pgcps.org> Mon, Oct 14, 2013 at 3:30 PM  
To: Robin Pope-Brown <robin.popebrown@pgcps.org>, Frances Cowan <fcowan@pgcps.org>  
Cc: Raynah Adams <rayadams@pgcps.org>

G [REDACTED] W [REDACTED] (000430322), K [REDACTED] S [REDACTED] (0005834858), and R [REDACTED] J [REDACTED] (000425976) were loitering in the hallway at the end of fourth period. They closed my classroom door in an attempt to hide their presence in the hall from me. They refused to follow the instruction to return to class and joked about how "messed up" I was. They insisted I was "doing too much" and was "out of control."

G [REDACTED], had ear-buds in and was listening to music; he refused to comply to the instructions turn it off and put it in his pocket. R [REDACTED] was out of uniform; he was wearing a tan coat and black winter hat. K [REDACTED] also, refused to follow instructions to go to class instead of his locker. When I stood in front of the lockers he cussed me out with repeated use of the word "fuck," including "get the fuck out of my way" and "you're so fucked up." Ms. Strickland called security to the scene and security got the names of the boys.

I have reported all three boys to the office for loitering prior to this incident (approximately one month ago) and the office reported them to security. G [REDACTED] has caused trouble for me since last year beginning with repeated, purposeful mis-genderings and continuing into this year with failure to come to class and a disrespectful attitude. I have been in conversation with Ms. Isom about him in the past and she pulled him from my classroom and placed him with Ms. Battle.

I have filed a PS-74 on each of the boys and discussed the situation with Mr. G.

Thank you for your attention on the matter. If possible, a notification of follow-up action would be appreciated.

Ms. Eller